Mattress 32

Stevenson, Todd A.

From: madeline sheron [mjsheron@yahoo.com]
Sent: Monday, February 21, 2005 12:10 PM
To: Stevenson, Todd A.
Subject: Mattress NPR

To whom it may concern,

I am very concerned about the chemicals being used in our mattresses. I have just bought several new beds and returned them due to chemical smells resulting in headaches. I should have the right to have unadulterated pure fabrics in our bedrooms when we sleep. These toxic chemicals are harmful and should not be legislated into our lives. It is ill-advised to expose millions of people to a potential health hazard in order to protect a few.
Madeline Sheron

Matter 33

Stevenson, Todd A.

From: Sue & Jim Keith [sue.jim@verizon.net]

Sent: Tuesday, February 22, 2005 1:33 AM

To: Stevenson, Todd A.

Subject: Stop the laws that put chemicals into our bedding

Please stop all laws that put chemicals for any reason into our bedding. If people want to buy bedding and mattresses with flame retardant chemicals, let them do so voluntarily. Those of us who do not want added chemicals, whether it be boric acid or any other chemicals, leave our bedding and mattresses alone. I am a cancer survivor. Those who are advocating for chemicals in our bedding and mattresses ought to be made to face a threatening disease possibly caused by toxic chemicals in their environment. Maybe they would get real! Many more thousands die of cancer annually than those who die from fire.

Mattress 34

Stevenson, Todd A.

From: Lovetro, Vicky A (VDO-Sunnyvale) [vicky.lovetro@hp.com]

Sent: Friday, February 25, 2005 9:53 PM

To: Stevenson, Todd A.

Subject: Mattress NPR: new law to flameproof mattresses

Re: Mattress NPR
Please do not pass a law that forces me to purchase a bed, clothing, or any other item that contains chemicals I do not want to be exposed to. I do not want to sleep on and breathe toxic chemicals night after night for the rest of my life on the off chance that my bed could catch on fire. Continual exposure to the strong chemicals used for fire retardants is a much greater risk than the one I face from fire.

As a responsible adult I can assess and take measures to prevent fire hazards. It is my right to be able to purchase and use products I feel are safe and pure for me and my family.

Thank you for your consideration,

Vicky Lovetro
5072 Hawley Ct
San Jose, CA 95118

Stevenson, Todd A. 35

From: Mark Strobel [mark@strobel.com]

Sent: Friday, February 25, 2005 3:55 PM

To: Danello, Mary Ann; Stratton, Hal; Chairman Stratton; Moore, Thomas H.; Account Terminated; Hartman, Jason J.; Neily, Margaret L.; Stevenson, Todd A.

Subject: Mattress NPR, Emailing: index.htm

http://www.ccfsm.org/pages/3/index.htm

Whitney Davis, man who wrote and started California law, now realizes mattress manufacturers are using toxic chemicals to meet law.

Will this law kill more people than it saves?

Law will expose 300 million people to varying degrees of risk to save 300 from fire.

More simply, will expose One Million People to Risk to save one, as mattresses are replaced

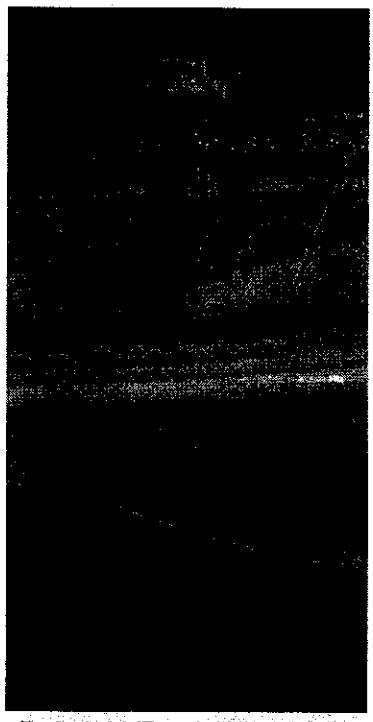
Stevenson, Todd A.

From: Mark Strobel [mark@strobel.com]
Sent: Friday, February 25, 2005 3:55 PM
To: Danello, Mary Ann; Stratton, Hal; Chairman Stratton; Moore, Thomas H.; Account Terminated; Hartman, Jason J.; Neily, Margaret L.; Stevenson, Todd A.
Subject: Mattress NPR, PeopleForCleanBeds.org, Emailing: index.htm

People For Clean Beds.org

People fighting to keep our mattresses and bedding clean from toxic flame reta

Is it safe to sleep in Roach Killer powder? Is the bene CPSC public comment period on proposed law to flam ends 3-14-05. (Last Chance to Stop Law) Send comments direct to CPSC:



Boric Acid (Roach Killer) exists a cotton batting. There is 1.5 lbs of a Queen mattress. Antimony Trio mixture. This is the least expensi flameproof mattresses. (Click for

The innerspring mattress industry went to the US Consumer Products Safety Commission (CPSC) and asked for, and strongly supports, this new law that mattresses resist ignition from open flames. The chemical industry also lobbies for this law. It is an example of government gone crazy with overregulation, without an act of Congress. It adds about $100 to the price of new mattresses. It makes no sense to expose 300 million people to even 'low risk,' to optimistically save 300 from fire. We know the chemicals used to flameproof mattresses are very poisonous. A large amount of these chemicals are required to be concentrated at the surface of the mattress to pass an overly strict open flame test, which has been called the toughest FR standard ever. No natural or synthetic fibers can pass this test without added chemicals. When asked about health risks, the CPSC responds, "We are already exposed to over one billion additional pounds of flame retardant chemicals every year." Our exposure in mattresses is unlike any other. We have full body and breathing contact eight hours every day for the rest of our lives. These chemicals healthcare and crib mattresses. The CPSC is ignoring the warnings of th

division, who says more study is needed, and is rushing this law throug mattresses have never been studied for human exposure. These chemi millions of mattresses nationwide in anticipation of the new law.

The CPSC admits they have no exposure data and cannot do a quantita Instead, they say they are doing a qualitative analysis, by relying on st judgment. In other words, they are guessing. They say study will be on test our entire population, and if they later find human damage, it is th government agencies to ban that specific chemical.

Boric Acid (Roach Killer) exists as loose dust mixed with the cotton batt Boric Acid in the surface of a Queen mattress. Antimony Trioxide is also This is the least expensive barrier system to flameproof mattresses. Th much better, none of them are safe.

Boric Acid (yes, the Roach Killer), Formaldehyde, Melamine, Antimony T Chloride, Zink Borate, and Decabromodiphenyl Oxide (Brominated flam found in women's breast milk) are the main chemicals being used to fla Many of these chemicals cause **cancer**. Some are known to be a **repro developmental toxin: high prenatal mortality, birth defects, redu Liver, kidney, brain, and heart muscle damage** are only some effe absorption, some of **these chemicals can kill from skin contact alo**

If our government guesses correctly, that it is safe for everyone to slee may save up to 300 people from fire. However, our exposure in mattre chronic. **If they are wrong**, and they have been wrong in the past, th to 300 million people. All of us sleep on a mattress. **The risk is huge.** the admonition: "First do no harm."

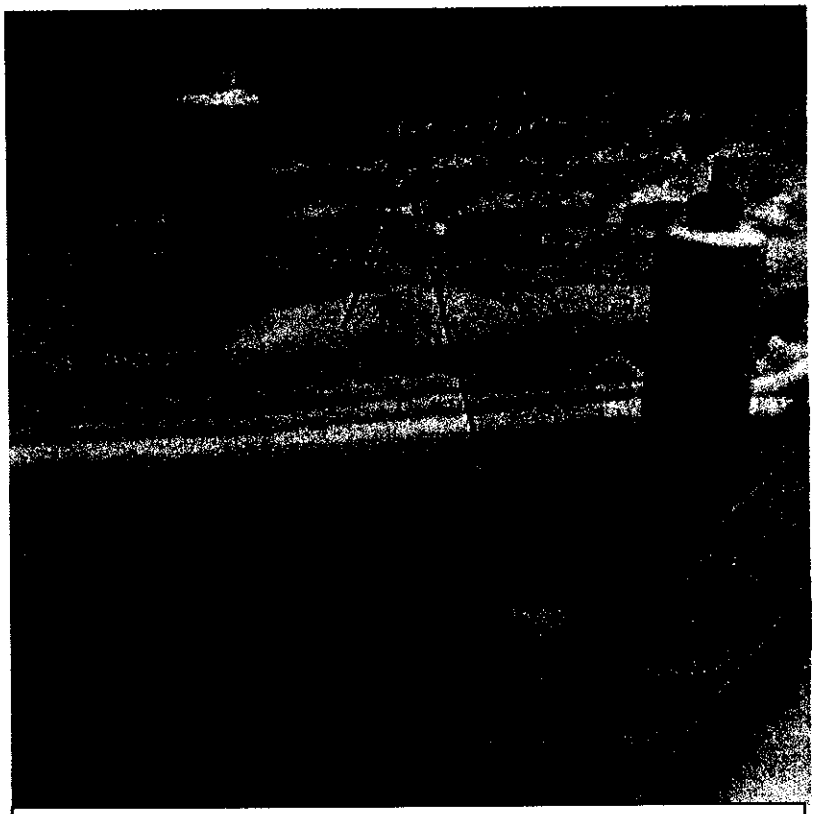
See the whole story at www.PeopleForCleanBeds.org where you also ca comments. See the proponent's side of the story at www.sleepproducts law is already effective in California. The law will be enacted nationwide year unless our comments can stop it. Please send comments directly t os@cpsc.gov, fax: 301-504-0127, mail: Office of the Secretary, Consur Commission, Washington, DC 20207-0001 Comments should be captio opponent wrote: **Forced inclusion of these chemicals constitutes a without consent.**

Editors Note: Above story is 599 words, hope you can use it. We hope least a small mention. See the short story by clicking here. Our website information, links to the law, CPSC, doctor quotes, EPA and CDC warnir MSDS's, opponent and proponent contacts, and references links to whe statements.

(Click here for Printer Friendly version)

If 10% of mattress flame barriers prove toxic – 30 Million People Die. If 1% are toxic – 3 Million People Die. 300 Million people are at risk.

Is it safe to sleep in Roach Killer powder? Is the benefit worth the risk? Repeal CAB-603 and prevent the national law. CPSC public comment period on proposed law to flameproof mattresses ends 3-14-05. (Last Chance to Stop National Law) Send comments direct to CPSC: cpsc-os@cpsc.gov



Boric Acid (Roach Killer) exists as loose dust mixed with the cotton batting. There is 1.5 lbs of Boric Acid in the surface of a Queen mattress. **EPA: "Use without dermal protection may result in serious chronic and developmental effects."**

This law to flameproof mattresses started in California with good intentions to protect people from fire, but did not consider the risks of the chemicals required to meet the law. The law was passed in 2001 and already effective 1-1-05. A new EPA 6-04 report shows more danger than previously thought. **The law is not even legal as federal law preempts it. But California chooses to enforce it anyway.** The innerspring mattress industry went to the US Consumer Products Safety Commission (CPSC) and asked for, and strongly supports, this new law that mattresses resist ignition from open flames. The chemical industry also lobbies for this law. It is an example of government gone crazy with overregulation, without an act of Congress. It adds about $100 to the price of new mattresses. It makes no sense to expose 300 million people to even 'low risk,' to optimistically save 300 from fire. We know the chemicals used to flameproof mattresses are very poisonous. A large amount of these chemicals are required to be concentrated at the surface of the mattress to pass an overly strict open flame test, which has been called the toughest FR standard ever. No natural or synthetic fibers can pass this test without added chemicals. When asked about health risks, the CPSC responds, "We are already exposed to over one billion additional pounds of flame retardant chemicals every year." Our exposure in mattresses is unlike any other. We have full body and breathing contact eight hours every day for the rest of our lives. These chemicals are also required in healthcare and crib mattresses. The CPSC is ignoring the warnings of their own health sciences division, who says more study is needed, and is rushing this law through. These flameproof mattresses have never been studied for human exposure. These chemicals are already in millions of mattresses nationwide in anticipation of the new law.

The CPSC admits they have no exposure data and cannot do a quantitative risk analysis. Instead, they say they are doing a qualitative analysis, by relying on staff's professional judgment. In other words, they are guessing. They say study will be ongoing, meaning they will test our entire population, and if they later find human damage, it is the responsibility of other government agencies to ban that specific chemical.

U.S. Consumer Products Safety Commission (CPSC) opens public comment period on new law to flameproof mattresses, this requires known toxic FR chemicals. Comment period closes March 14, 2005 (Last Chance to Stop this Law!)

This law affects YOU! You and your family will soon sleep in these chemicals for the rest of your lives. Is it safe? We know the chemicals used are very poisonous and are concentrated at the surface of the mattress. These mattresses have never been tested for offgassing or exposure. Our exposure is intimate and chronic. In addition to mattresses, the laws also soon require these chemicals in our bedclothes, our mattress pads, sheets, blankets, bedspreads, comforters, and pillows.

Happy New Year, **Californians can no longer buy a clean mattress** without a prescription, the rest of the nation is not far behind. The new law will be effective nationwide within the year.

Send comments directly to: cpsc-os@cpsc.gov

It requires a lot of poisonous flame retardant chemicals to pass this large open flame test (Click for larger image.)

If our government guesses correctly for us in predicting the future of the next 40 or more years, that it is safe for everyone to sleep in these chemicals, we optimistically will save up to 300 people from fire. However, our exposure in mattresses is more close and chronic than any other type of chemical exposure. We have full body and breathing contact eight hours every day. **If they are wrong,** and we have been frequently wrong in the past, as many flame retardant chemicals have been banned after we find human damage. We could harm or kill up to 300 million people. All of us sleep on a mattress. **The risk is huge**. If we later find harm to only 1% of our population, we will have harmed 3 million people. Is the benefit worth the risk?
Hippocrates left us with the admonition: "First do no harm."

Proponents try to tell us they use inherently flame retardant fibers, not flame retardant chemicals, that Boric Acid has been widely used in innerspring mattresses for more than thirty years, and that they have done due diligence to be sure these chemicals are safe for human exposure in mattresses. **None of these statements are true**. See above linked words and the rest of this story for rebuttals. See dangers of these chemicals, their Material Safety Data Sheets (MSDS), References, and contacts who favor or oppose this law below. See the whole story at www.PeopleForCleanBeds.org or simply www.CleanBeds.org were you can also vote on this issue. The Health Sciences Division of the CPSC says more study is needed, yet this will soon become law.

Leading doctors **Allan D. Lieberman, M.D.**, F.A.A.E.M. and **Doris J. Rapp, M.D.**, F.A.A.A., F.A.A.P., who specialize in human chemical exposure, **strongly oppose these chemicals in mattresses, and this law**. "We live in a very technologically advanced world, which advocates the advantages of these technologies but rarely ever considers the disadvantages or potential harm. ... **It seems ill advised to expose hundreds of millions of people to a potential health hazard in order to protect a very few.** .... I am absolutely opposed to adding the proposed toxic chemicals to mattresses." Allan D. Lieberman, MD. See their full comments, address, email, and phone by clicking here.

Please review the facts and comment on this issue. It is our last chance to stop this law. Please send comments directly to the CPSC: cpsc-os@cpsc.gov, Subject: Mattress NPR, or fax 301-504-0127, see full address below.

Risks of FR Law

In spite of warnings from their own Health Sciences Division, the CPSC is rushing this law through. **This division of the CPSC warns more study is needed**, and that "CPSC staff has previously provided its opinion that boric anhydride and **Boric Acid are acutely toxic**, ... Moreover, it is staff's opinion that Boric Acid [Yes, the Roach Killer] falls within the CPSC's chronic toxicity guidelines issued under the FHSA. It is a **probable reproductive and developmental toxicant in humans**, based upon sufficient animal data."[1] Boric Acid/Antimony flame barrier systems are the least expensive choice, and the most widely used. At least one major brand already puts this system in all their mattresses nationwide.

Even though we know infants are unusually susceptible to Boric Acid poisoning, **these chemicals are also required in crib mattresses**. "In the past, boric acid was used as a topical treatment for infants with diaper rash. However, even in diluted (3%) form it caused significant toxicity and two deaths."

Most people trust government would do due diligence to be sure the chemicals used to make mattresses flame proof are safe for human exposure. If you look at the facts you too will become alarmed.

Besides all California mattresses, Millions of new mattresses nationwide already contain these chemicals in anticipation of the new law. There no labeling requirements and you can't know what chemicals you are getting. (The CPSC states consumers couldn't discern a safe system,[2] they are right in that there is no safe choice.)

A new California law already effective Jan 1, 2005, and the new federal flammability standards require mattresses to withstand a 12 inch wide open flame on the side for 50 seconds, and a simultaneous 10 inch wide open flame on the top for 70 seconds, and then not ignite for thirty minutes, even though a 1973 law already requires mattresses not ignite from a cigarette burning all the way down. To meet this new standard, new mattresses use a barrier system just under the ticking that is filled with known toxic flame retardant chemicals.

The science of toxicology uses high dose short-term chemical exposure on various animals to predict the effect of low dose long-term exposure on humans. Our risk in mattresses is long-term intense exposure. Science considers type and duration of exposure to determine risk, with chronic exposure to even low doses considered most dangerous. Our exposure in mattresses is literally in your face, full body contact of breathing and absorbing through skin, these chemicals eight hours every day for the rest of our lives. No other type of chemical exposure comes close to the intensity and duration of that in mattresses.

The CPSC lists the following chemicals as the primary ones used in mattress surfaces to meet this law: **Boric Acid** (yes, the Roach Killer), **Formaldehyde**, **Antimony Trioxide**, **Decabromodiphenyl Oxide** (Brominated flame retardant now being found in women's breast milk) , **Vinylidiene Chloride**, **Zink Borate**, and **Melamine**, are the main chemicals being used. These chemicals have never been studied for human exposure in mattresses. There are no offgasing studies. Since there is no exposure data the CPSC says a quantitative risk analysis cannot be made. Therefore they are relying on a qualitative risk assessment, CPSC staff's professional judgment.[3] In other words, they are guessing about exposing 300 million people to these chemicals. If you look at modern scientific reports and Material Safety Data Sheets (MSDS), linked at the bottom of this document, you see that **these chemicals are not just slightly toxic, they are incredibly poisonous to people**. How we can justify sleeping in these chemicals is incredulous.

The CPSC states two chemical systems are "low risk." The low risk systems include a "Formaldehyde - Melamine system (Melamine Resins)" and a Vinylidiene Chloride system, while more study is needed for other systems: "Exposure data for antimony, boric acid/zinc borate, and decabromodiphenyl oxide are needed before more definitive conclusions about the potential risk of adverse health effects from these chemicals can be made." [4] "

The CPSC calls Vinylidiene Chloride with Antimony Trioxide (Modacrylic fibers) "Moderate Risk" even though they have no data and quoting the CPSC health sciences division draft of this law "**Antimony is regarded as a possible inhalation carcinogen.** ... There is limited data to suggest that antimony may be released from a polymer matrix. ... The results of the limited testing suggest that antimony may be released in measurable quantities from a polymer matrix. ... the amount of antimony found in a barrier is expected to be higher than in the polyester fabrics ... The amount of antimony migrating from treated barriers is expected to be higher as well." [5]

For the Formaldehyde and other systems the CPSC states they expect the mattress pad and sheets to provide some protection from this chemical exposure. Then they announce they are going after bedclothes next to make them flameproof, this will require these chemicals in our mattress pads, sheets, blankets, comforters, and pillows.

Ironically the Vinylidene Chloride system they call 'low risk' will not pass the flame test without Antimony Trioxide added. Thus there is only one system they consider to be 'low risk.'

The CPSC opinion on which barrier systems are low risk is meaningless because most Mattress Manufacturers are actually using the least expensive flame barrier systems that are higher risk, including Boric Acid/Antimony treated cotton barriers, and Modacrylic/Antimony barriers, to flameproof mattresses. Very few use the system the CPSC considers low risk. I question the 'low risk' Melamine Resin system. It is made from the reaction of Melamine and Formaldehyde. It has never been tested for outgassing. **It contains free Formaldehyde.** The CPSC states Formaldehyde may be released. This may be the highest risk system. It shows there is no safe system. Even melamine gives stones in the urinary bladder and **Formaldehyde is known to be very poisonous and cancer causing.**

This mattress cutaway shows how Boric Acid is used in mattresses. The layer at the surface is fluffy cotton batting treated with Boric Acid. The layer next to the springs is compressed cotton batting treated with Boric Acid. The law label tells us the mattress contains: 47% Urethane Foam, **39% Treated Cotton**, 13% Polyester Fiber. Boric Acid exists as loose dust mixed with the cotton fibers, it is not chemically bound. There can be more than 1.5 pounds of Boric Acid in the surface of a queen mattress. In addition the cotton batting also contains Modacrylic with Antimony Oxide.

There are huge health risks from full body contact and breathing these chemicals eight hours a day for the rest of our lives. Our science warns us many of these chemicals are regarded as carcinogenic. Others are known to be a **reproductive and developmental toxin: high prenatal mortality, birth defects, reduced fertility, sterility. Liver, kidney, brain, and heart muscle damage** are other effects. Numerous other harmful health effects also exist. Aside from inhalation absorption, some of these chemicals can kill from skin contact alone. People with allergies, asthma, preexisting conditions, fetuses, infants, children, elderly, and other special populations, are probably at even greater risk.

Proponents talk about inherently flame retardant fibers. There are no natural fibers that pass this test. The only inherently flame retardant fibers the CPSC mentions, or that I know of, are Para-Aramids (Kevlar) and Fiberglass. Kevlar is a chemical blend that contains some cancer causing chemicals, though at less than .1%, but it is only used in the thread to hold the flame barriers together. Fiberglass is considered to be as bad as Asbestos.(6) Small particles accumulate in your lungs. Asbestos in buildings is considered safe as long as it is left undisturbed. The chemicals in mattresses are disturbed with every body movement of tossing and turning, pushing chemicals and perhaps glass into our face for us to breathe and absorb. The latency period for Asbestos poisoning is 30 to 40 years. What will it be for mattress poisoning?

Benefits of Law

Proponents estimate this law will save up to 300 people per year from fire -- after ten to fourteen years when all existing mattresses are replaced. Thus, with 300 million people in the US, **your fire death risk from untreated mattresses is one in one million. Your or your children's risk of being slowly poisoned from sleeping in toxic chemicals for the rest of your lives is unknown**.

According to USA Today, "Though the USA has the world's toughest flame retardancy standards, 3,000 people die in fires each year. The Chemical Manufacturers Association estimates the number would be up to 960 higher without the [1.2 Billion pounds of] flame-retardant chemicals we now use [annually].(7) "From 1980 to 1998, bedroom fires dropped 68 percent and their related deaths by 52 percent, according to the U.S. Consumer Product Safety Commission. Why? -- A standard that was enacted in 1973 that prevents mattress ignition from cigarettes. Do we need more regulation?

It seems unrealistic that these chemicals in mattresses alone will save one-third more people than the current 1.2 billion pounds of flame retardant chemicals we already use annually. If this law eventually saves 50 people it would save one in six million people who are exposed to these chemicals. Your risk of dying in a commercial airline crash is one in fifteen million. We should save every life we can, but what about the risk? Which choice will actually save more lives? Military commanders often have to make life and death decisions. How many would risk one million people to save one? Is this benefit worth the risk?

With no offgassing or exposure data of the poisonous chemicals in mattresses, the CPSC guesses and calls one system 'low risk', and another 'moderate risk', and then translates both to 'negligible risk.' It defies common sense to put 300 million people at even low risk to save 300. What about the millions of unfortunate people who unknowingly get systems in their new mattresses that are considered high risk? The CPSC answers that after we test our entire population other agencies will ban that specific chemical after we find human harm.(8) At this late stage how many millions of people will we have harmed or killed?

Proponents of Law

Look at the innerspring mattress industry who asked for, and pushed very hard for this law. It benefits them by increasing prices, revenue, and profits, and protects their turf by hurting smaller competition with high testing and compliance costs. It benefits the chemical industry who also lobbies for this law. Then look at the facts.

I spoke with the largest mattress retailer in the US who told me: "We can't fight this law. The big innerspring mattress manufacturers are controlled by investment bankers and don't care about people. Plus the chemical companies are multi-billion dollar firms; you can't win against their lobbing efforts."

Opponents of Law

I don't try to hide that I am a mattress manufacturer. I have been in business for thirty years and know a lot about my industry. Since investment bankers do not control me, I started and own 100% of the company, I am free to speak my heart on this issue. The more I research this issue, the more alarmed I become. I have been researching and trying to fight this issue for more than a year and a half. I have spent 1,500 personal hours and thousands of dollars on this project. I have sent at least six letters and numerous emails to thousands of news media. I have gotten some coverage in the trade press.

I would be better off financially if I did nothing to fight this issue and simply let it pass into law. I make memory foam mattresses and waterbeds. Waterbeds without quilted covers are exempt from this law since they will not burn. On my memory foam mattresses I could simply add a barrier like everyone else, raise prices and make more money on the same number of unit sales. Since we couldn't stop this law in California, I recently put up a website called www.PrescriptionBeds.com. Fortunately, the law allows: "a physician, chiropractor, or osteopath" to prescribe a special mattress free of these chemicals. Strobel makes mattresses that are totally free of flame retardant chemicals and has the special labels and procedures required for prescription beds under the law. Californians and others who are unsure of what chemicals are in new mattresses at least have a choice to get a clean bed with a doctor's prescription. If I can't save everyone I want to save as many as possible from this exposure risk. Still, I would rather stop this law than sell prescription beds or waterbeds, my greater concern is our 300 million people.

We have tried to involve retailers to fight this law with letters and emails to 17,192 retailers, and within four days even got a response from ISPA (International Sleep Products Association, the innerspring mattress manufacturers who started and favor this law). They sent out a Special Edition Newsletter to their members trying to rebut us, to show to retailers. **They do admit it requires flame retardant chemicals to meet this law**. I have links to their rebuttal, as well as all my sources of research. Many retailers also oppose this law, see: retailer-comments.htm. On request we can send you the full list of retailers who oppose this law and made comments with name, address,

phone, and email address.

You will also find links to all the documents published by the CPSC on this issue at Quotes-CPSC.htm. Plus links to studies and reports of previous public health disasters from flame retardant chemicals such as PCB's banned in the 70's that have continuing health and environmental damage to this day. Deca, and Tris, have also been banned. Brominated flame-retardants are now being found in women's breast milk. If you read my work you will likely come to believe my intentions are pure. It is of course, up to you, if you mention my name or websites. The issue is what is important. As one voter commented: **"Why doesn't the media expose the truths for our safety."** The huge health risk is very real. Please report this story to protect the public health. Americans should be given the opportunity to send comments to the CPSC on this issue, which directly affects them.

What you can do

People can learn more, vote and leave comments, on this issue at www.PeopleForCleanBeds.org/vote.htm. People can also become a member of our organization PeopleForCleanBeds.org, for free, by simply checking a box on the vote form. We don't ask for money, only support in opposing this crazy law. We will forward your comments to the CPSC. You should also send your comments directly to the CPSC cpsc-os@cpsc.gov, subject: "Mattress NPR", see full mailing address and fax below. It would also be helpful if you could write or call your legislators, find their contact info at law.htm

You should ask CPSC commissioner Hal Stratton if he has read, or is choosing to ignore the warnings of his own health sciences division. He is pushing this law through as fast as possible. Ask him to do one of their stated options, stop this law. When asked about the health dangers of the chemicals used the CPSC responds: Americans are already exposed to over one billion pounds of additional flame retardant chemicals every year. The logic being that our now sleeping in these chemicals won't hurt us. (Doctors are already concerned about our toxic load.) Then they state that other government agencies are responsible for banning harmful chemicals. (As the say in the pesticide industry, "there are no safe chemicals, only safe use.") Finally they say study will be ongoing, meaning that we are going to test our entire population. Then if we find we have harmed people, that specific chemical will be banned.(8) From what our science knows and tells us about the risks of these chemicals it seems likely we will eventually find human harm. Then it will be too late! How many millions of people will we kill or harm? If it is only 15% of the population it will be 45 million people. This chemical exposure in mattresses literally touches everyone; it has the potential to be our largest public health disaster ever.

Please, please call me at 812-282-4388. I can give you a lot more information and rebut what proponents tell you. We don't seem to learn from our toxic legacies of the past. It would be nice, for once, to have the common sense to prevent this potential disaster. The risk outweighs the benefit.

Sincerely, Mark Strobel, Director, People for Clean Beds.org, 3131 Industrial Parkway, Jeffersonville IN 47130, Phone: 812-282-4388, Fax: 812-282-6528, Email: Mark@PeopleForCleanBeds.org Web: www.PeopleForCleanBeds.org or www.CleanBeds.org

References:

(1) "CPSC staff has previously provided its opinion that boric anhydride and boric acid are acutely toxic, ... Moreover, it is staff's opinion that boric acid falls within the CPSC's chronic toxicity guidelines issued under the FHSA. It is a probable reproductive and developmental toxicant in humans, based upon sufficient animal data." (Page 148)

(5)" Antimony is regarded as a possible inhalation carcinogen. ... There is limited data to suggest that antimony may be released from a polymer matrix. ... The results of the limited testing suggest that antimony may be released in measurable quantities from a polymer matrix. ... the amount of antimony found in a barrier is expected to be higher than in the polyester fabrics ... The amount of antimony migrating from treated barriers is expected to be higher as well." (Page 166), http://www.cpsc.gov/library/foia/foia05/brief/mattressespt3.pdf

(2), (8), Federal Register / Vol. 70, No. 9 / Thursday, January 13, 2005 / Proposed Rules 2477, p9 of PDF, item 6.: http://www.cpsc.gov/businfo/frnotices/fr05/openflame.pdf

(4) "Exposure data for antimony, boric acid/zinc borate, and decabromodiphenyl oxide are needed before more definitive conclusions about the potential risk of adverse health effects from these chemicals can be made."
(3), (4) page 17 of CPSC, http://www.cpsc.gov/library/foia/foia05/brief/mattressespt1.pdf

(6) Fiberglass Information Network: http://www.sustainableenterprises.com/fin/basic.htm

(7) http://www.usatoday.com/news/health/2003-09-22-breast-milk_x.htm

Contacts who favor this law:
Hal Stratton, CPSC Chairman, hstratton@cpsc.gov, chairmanstratton@cpsc.gov, phone: (301) 504-7900 fax: (301) 504-0121; Thomas Moore, Vice Chairman, tmoore@cpsc.gov phone: (301) 504-7901, fax: (301) 504-0121; Directorate for Health Sciences, Associate Executive Director - Mary Ann Danello, mdanello@cpsc.gov , phone: (301) 504-7919, fax: (301)504-0079; Ken Giles - kgiles@cpsc.gov, phone: 301-504-7052; U.S. CPSC Headquarters, 4330 East West Highway, Bethesda, MD 20814, phone: (301) 504-7908, fax: (301) 504-0399 Website: www.cpsc.gov

Richard (Dick) Doyle, President, International Sleep Products Association (ISPA) (The innerspring mattress manufacturers association) www.sleepproducts.org ISPA asked the CPSC to start this law and strongly supports it. Interestingly, Leggett & Platt, their largest member, (who supplies about 93% of the raw innerspring mattress units to all the mattress brands), plus their next two largest members, Sealy, and Serta, all recently withdrew their membership from ISPA. 501 Wythe Street, Alexandria, VA , 22314-1917 tel 703.683.8371 fax 703. 683.4503

Contacts who oppose this law:
ALLAN D. LIBERMAN, M.D., F.A.A.E.M., Diplomate, American Board of Environmental Medicine, Member, American College of Occupational, & Environmental Medicine, CENTER FOR OCCUPATIONAL & ENVIRONMENTAL MEDICINE, P.A., 7510 NORTHFOREST DRIVE, N. CHARLESTON, SC. 29420-4297, Phone 843-572-1600 / Fax 843-572-1795, Website: www.coem.com E-mail: allanl@coem.com

Doris J. Rapp, MD, F.A.A.A., F.A.A.P. Is a board-certified environmental medical specialist and pediatric allergist. She was a clinical assistant professor of pediatrics at the State University of New York at Buffalo. Dr. Rapp is the founder of the Practical Allergy Foundation and is a past President of the American Academy of Environmental Medicine. She is also the author of several books., 1421 Colvin Blvd, Buffalo, New York 14223, Phone 716-875-0398, Fax 716-875-5399, Website: www.drrapp.com Email drrappmd@aol.com

Mark Strobel, President, Strobel Technologies, 3131 Industrial Parkway, Jeffersonville IN 47130, Phone: 812-282-4388, Fax: 812-282-6528, Email: health@strobel.com, Web: www.Strobel.com On request can send you the full list of retailers who oppose this law and made comments with name, address, phone, and email address.

Material Safety Data Sheets (MSDS) and Scientific Reports on Chemicals used to flameproof mattresses:

EPA Boric Acid Review, June 2004, Conclusions: "have identified the developing fetus and the testes as the two most sensitive targets of boron toxicity ... high prenatal mortality, reduced fetal body weight and malformations and variations of the eyes, central nervous system, cardiovascular system, and axial skeleton ... The testicular effects that have been reported include reduced organ weight and organ:body weight ratio, atrophy, ... reduced fertility and sterility" http://www.epa.gov/iris/toxreviews/0410-tr.pdf

CDC Boric Acid Review, Health Effects, 1992, Conclusions: "Demonstrated injury to the gonads and to the developing fetus. ... Boron (as boron oxide and boric acid dusts) has been shown to cause irritation of the upper respiratory tract in humans. ... Boron does cause health effects following acute dermal exposure. ... Neonatal children are unusually susceptible to boron exposure. ... Neurological damage is an area of concern following exposure to boron ... http://www.atsdr.cdc.gov/toxprofiles/tp26-c2.pdf

Boric Acid MSDS: "Chronic Exposure: Prolonged absorption causes weight loss, vomiting, diarrhea, skin rash, convulsions and anemia. Liver and particularly the kidneys may be susceptible." http://www.rosemill.com/html/msds/chem_boric_acid_msds.pdf

Antimony Oxide MSDS: "Potential Health Effects: ... May cause heart to beat irregularly or stop. ... Chronic Exposure: Prolonged or repeated exposure may damage the liver and the heart muscle. Prolonged skin contact may cause irritation, dermatitis, itching, and pimple eruptions. There is an association between antimony trioxide production and an increased incidence of lung cancer." http://www.jtbaker.com/msds/englishhtml/a7236.htm

Vinylidene Chloride MSDS: irritation, symptoms of drunkenness, lung congestion, liver damage, convulsions LONG TERM EXPOSURE: kidney damage, tumors http://www.matheson-trigas.com/msds/MAT25070.pdf

Decabromodiphenyl Oxide, Brominated Flame Retardant, 82% Bromine Minimum, contains free Bromine, http://www.grchem.com/product-30_e.htm

Bromine MSDS: "Skin Contact: Corrosive! Symptoms may include skin discoloration, pain, serious burns, blistering, and slow healing ulcers. Eye Contact: Corrosive. Can cause blurred vision, redness, pain, severe tissue burns and eye damage. Chronic Exposure: Pulmonary edema, pneumonia, diarrhea, and rashes may be delayed complications of severe exposures." http://www.jtbaker.com/msds/englishhtml/b3905.htm

FORMALDEHYDE MSDS: "POISON! DANGER! SUSPECT CANCER HAZARD. MAY CAUSE CANCER. Risk of cancer depends on level and duration of exposure. VAPOR HARMFUL. HARMFUL IF INHALED OR ABSORBED THROUGH SKIN. CAUSES IRRITATION TO SKIN, EYES AND RESPIRATORY TRACT. STRONG SENSITIZER. MAY BE FATAL OR CAUSE BLINDNESS IF SWALLOWED. **CANNOT BE MADE NONPOISONOUS.**" http://www.jtbaker.com/msds/englishhtml/F5522.htm

Notice: The statements and questions contained in this notice are not intended to convey allegations regarding any particular company, person, or association. Readers should conduct their own investigation of a company or association or person to ascertain the particular policies, practices, and motivations of that entity. We have reported what we believe to be true and correct to the best of our knowledge and opinion at the time of its writing in a free speech effort to avert a public health disaster.

Comments will be received by OMB until March 14, 2005. ADDRESSES: Comments should be filed by email to cpsc-os@cpsc.gov . Comments also may be filed by telefacsimile to (301)504-0127 or mailed, preferably in five copies, to the Office of the Secretary, Consumer Product Safety Commission, Washington, DC 20207-0001, or delivered to the Office of the Secretary, Consumer Product Safety Commission, Room 502, 4330 East-West Highway, Bethesda, Maryland; telephone (301) 504-7530. Comments should be captioned "Mattress NPR."

Is it safe to sleep in Roach Killer powder? Is the benefit worth the risk? CPSC public comment period on proposed law to flameproof mattresses ends 3-14-05. (Last Chance to Stop Law) Send comments direct to CPSC: cpsc-os@cpsc.gov

The innerspring mattress industry went to the US Consumer Products Safety Commission (CPSC) and asked for, and strongly supports, this new law that mattresses resist ignition from open flames. The chemical industry also lobbies for this law. It is an example of government gone crazy with overregulation, without an act of Congress. It adds about $100 to the price of new mattresses. It makes no sense to expose 300 million people to even 'low risk,' to optimistically save 300 from fire. We know the chemicals used to flameproof mattresses are very poisonous. A large amount of these chemicals are required to be concentrated at the surface of the mattress to pass an overly strict open flame test, which has been called the toughest FR standard ever. No natural or synthetic fibers can pass this test without added chemicals. When asked about health risks, the CPSC responds, "We are already exposed to over one billion additional pounds of flame retardant chemicals every year." Our exposure in mattresses is unlike any other. We have full body and breathing contact eight hours every day for the rest of our lives. These chemicals are also required in healthcare and crib mattresses. The CPSC is ignoring the warnings of their own health sciences division, who says more study is needed, and is rushing this law through. These flameproof mattresses have never been studied for human exposure. These chemicals are already in millions of mattresses nationwide in anticipation of the new law.

The CPSC admits they have no exposure data and cannot do a quantitative risk analysis. Instead, they say they are doing a qualitative analysis, by relying on staff's professional judgment. In other words, they are guessing. They say study will be ongoing, meaning they will test our entire population, and if they later find human damage, it is the responsibility of other government agencies to ban that specific chemical.

Boric Acid (Roach Killer) exists as loose dust mixed with the cotton batting. There is 1.5 lbs of Boric Acid in the surface of a Queen mattress. Antimony Trioxide is also included in the mixture. This is the least expensive barrier system to flameproof mattresses. (Click for larger image)

Boric Acid (Roach Killer) exists as loose dust mixed with the cotton batting. There is 1.5 lbs of Boric Acid in the surface of a Queen mattress. Antimony Trioxide is also included in the mixture. This is the least expensive barrier system to flameproof mattresses. The other systems aren't much better, none of them are safe.

Boric Acid (yes, the Roach Killer), Formaldehyde, Melamine, Antimony Trioxide, Vinylidiene Chloride, Zink Borate, and Decabromodiphenyl Oxide (Brominated flame retardant now being found in women's breast milk) are the main chemicals being used to flameproof mattresses. Many of these chemicals cause **cancer**. Some are known to be a **reproductive and developmental toxin: high prenatal mortality, birth defects, reduced fertility, sterility. Liver, kidney, brain, and heart muscle damage** are only some effects. Aside from inhalation absorption, some of **these chemicals can kill from skin contact alone**.

If our government guesses correctly, that it is safe for everyone to sleep in these chemicals, we may save up to 300 people from fire. However, our exposure in mattresses is intimate and chronic. **If they are wrong**, and they have been wrong in the past, they could harm or kill up to 300 million people. All of us sleep on a mattress. **The risk is huge**. Hippocrates left us with the admonition: "First do no harm."

See the whole story at www.PeopleForCleanBeds.org where you also can vote and leave comments. See the proponent's side of the story at www.sleepproducts.org. As of 1-1-05, this law is already effective in California. The law will be enacted nationwide by the CPSC within the year unless our comments can stop it. Please send comments directly to the CPSC: email: cpsc-os@cpsc.gov, fax: 301-504-0127, mail: Office of the Secretary, Consumer Product Safety Commission, Washington, DC 20207–0001 Comments should be captioned "Mattress NPR." One opponent wrote: **Forced inclusion of these chemicals constitutes a human experiment without consent.**

Editors Note: Above story is 599 words, hope you can use it. We hope you do a feature, or at least a small mention. See the short story by clicking here. Our website has much more information, links to the law, CPSC, doctor quotes, EPA and CDC warnings on these chemicals, MSDS's, opponent and proponent contacts, and references links to where you can verify all our statements.

Public and Scientific Comments www.PeopleForCleanBeds.org

City: Sequim
State: WA
Zip: 98382

Every flame retardant chemical suggested for inclusion in mattresses has NOT been proven to be safe to humans. Existing data does not support the use of these chemicals on a long term basis for all people including pregnant women, infants, children, the elderly, those with immune diseases, those with cancer and/or heart disease, those with respiratory illnesses, those with neurological conditions, those with mental illnesses, those with skin diseases - or anyone for that matter.

Use of these chemicals in mattresses will bring them into contact with other chemicals found in bedding, personal care products, air fresheners, laundry product residues, off-gassed chemicals from building materials and carpets - no studies have been done to determine the synergistic effects of these chemicals.

Forced inclusion of these chemicals constitutes a human experiment without consent.

****

City: Scottsdale
State: AZ
Zip: 85251

As an Environmental Specialist, I'm shocked that mattresses will have to have more chemicals added in order to meet such extreme fire resistance testing. It's getting increasingly difficult to avoid contaminants in our environments. The addition of finely milled boric acid will undoubtedly increase inhalation and dermal exposure and to a lesser amount ingestion of this toxic chemical to adults, children and infants. Many adults sleep with their infants and will cause respirable dust from the inside of the mattress to become airborne. We test homes of individuals with respiratory problems, allergies, chemical sensitivities, impaired immune systems, have other health problems or simply concerned about there environment. Mattresses and bedding are tested with a laser particle counter. The addition of this powder will easily show up in testing and the mattress will most likely fail for cleanliness. Mattress accumulate dander, atmospheric contaminants and construction debris, including drywall dust,. These fine respirable contaminants pose a health risk to many individuals and are almost impossible to remove from mattresses. Now it's almost law that almost incalculable numbers of extremely small sized respirable toxic chemicals will be added in powder form and pose an even greater risk to us that the risk that fire pose. How many of us have health problems that will be exasperated from this fire retardant? Considerably over 10% of our population has respiratory problems. Add to that infants and young children with not fully developed lungs. How many will develop hypersensitivities to just the fine dust size aspects of boric acid and now have chronic problems to other particulates as well. Add to this number the people with chemical sensitivities and you will have over 50 million people affected (assuming they all were exposed to these treated mattresses). Then add the unknown long term health problems that will develop from up to ten years of exposure for up to eight hours per day.
The risk far outweighs the benefit in trying to save the lives of 100 people per year.
How may lives can we save by eliminating defective smoke alarms by testing them with smoke rather than simply pushing the button ? Why are dual sensor smoke detectors not required?
It should not be the responsibility of our government to go overboard in trying to save a few lives and in doing so jeopardize the health of the majority.
Russell B. Olinsky, M.S. Environmental Specialist

****

City: Appleton
State: WI
Zip: 54913-9563

Consumers must be offered choices. I choose not to smoke and I choose not to burn candles in my home. I have smoke detectors and Co2 detectors placed at our bedroom doors. Currently, I purchase chemical-free all cotton feminine hygiene products (European) over the Internet. I purchase dye- and fragrance-free household products. I purchased cotton diapers as my children developed rashes from disposable ones. I NEED to retain the CHOICE to purchase bedding materials that will not harm my family's health.
****

City: kerhonkson
State: ny
Zip: 12446

I say let the people who want these chemicals to be put in beds should be the ginnie pigs for the rest of us. After they and their families have slept in them for at least 30 years, then we will know if they are safe or not.
****

City: Lumberton
State: NC
Zip: 28360

It is very disturbing that more chemicals will be required in our homes. The number of persons already dying from cancer, leukemia, etc is overwhelming. Imagine the numbers added to that from chemical poisoning. As a young woman suffering with infertility, I also would not want to take any chance that these mattresses would not increase that possibility for others. This law must be stopped!
****

City: Coarsegold
State: CA
Zip: 93614

I live in California. Years ago I was chemically poisoned and now have severe multiple chemical sensitivities and sinus disease. I am on Social Security Disability as a result. I cannot think of anything more incredibly stupid than to sleep on a mattress full of chemicals. I cannot, as I must avoid all chemicals. I know thousands like me, who would probably die from such a prolonged and continuous exposure. Are we not to ever sleep in a bed again? (Of course, I would have to import a new mattress from out-of-state since this law has already gone into effect). Most house fires do not begin in the mattress and most people die from the smoke inhalation, not from the fire spreading into the bedroom and onto the mattress.

It would be better to require indoor house sprinklers in all new construction, and increase awareness of the importance of smoke detectors than enact this law.

This law is profoundly foolish and will result in many mystery respiratory problems and eventual disabilities.
****

City: Marina Del Rey
State: CA
Zip: 90295

Any use of chemicals compromises our immune system. And, people are already in stressed situations due to the air, water and other chemicals. When a person sleeps this is the bodies repair time. To use any chemicals in the bed or bedding is just putting the immune system under more stess and compromises the bodies ability to heal itself.
****

City: Jordan
State: New York
Zip: 13080

I have already been injured by chemicals which resulted in my becoming disabled by Multiple Chemical Sensitivities. We need a new mattress but I know I would not be able to tolerate sleeping on one without becoming very ill. When will this senseless over use of chemicals be stopped?
****

City: Riverside
State: IL
Zip: 60546

Putting toxic chemicals in mattresses will create more problems than the one it was designed to solve. I am sensitive to many household chemicals and am currently working very hard to eliminate toxic chemicals from my household. I am strongly opposed to the new industry standards which require mattresses to be flame retardent.
Julie Laffin
Riverside, IL
****

City: San Leandro
State: CA
Zip: 94577

This chemical soup is deadly; stop this crazy attempt by chemical companies and major mattress makers to reap overwhelming profits at the risk of anyone using a new bed!
****

City: Huntington
State: NY
Zip: 11743

Like most things it seems like informed consent would be a nice option to have. Also, the ability to have options (a mattress with no problematic chemicals added to it) is a good thing as opposed to having to have these beds with things in them that I might not choose to have for health reasons.
****

City: Kallangur
State: Queensland
Zip: 4503
Australia

Please visit my website Diana Buckland GLOBAL RECOGNITION CAMPAIGN for MULTIPLE CHEMICAL SENSITIVITY and other chemically induced illnesses, diseases and injury
www.mcs-global.org
****

City: Strathmore
State: CA
Zip: 93267

We all carry harmful chemicals in our bodies today...chemicals need to be tested, and they need to be regulated. Putting chemicals in our bedding will cause more harm than good.
I do what I can to protect my family from contact with chemicals.
****

City: Norridgewock
State: ME
Zip: 04957

The idea that the mattress industry pushed for these laws makes them suspect. Each human being in this world already carries a large chemical burden in their bodies from the manufactred chemicals and pollutants of the last 100 years. We spend one third of our lives sleeping. Exposing humans to known poisons ON PURPOSE for one third of their lives is just absurd. Making it a LAW, so that those who want to opt out, can't, is unacceptable. All mattresses must be labled with all chemicals used - not just a cover category, as in FIRE RETARDANT, but a list of all chemicals used, so that the consumer can research what it is they are sleeping on and breathing in for eight hours, every night of their lives. Where are the studies which show effects over time on humans sleeping on mattresses with these poisons in them?
****

City: Kenmore
State: WA
Zip: 98028

The toxic load on our bodies is high enough without purposefully increasing the load.
****

City: Olympia
State: WA
Zip: 98502

Flame retardants may be important if you smoke in bed - I don't intend to do so.
Flame retardants are known to be hazardous to health - the bed should be the safest place for a person, hence the flame retardants should be removed.
I also don't want them in my nightclothes.
****

City: Federal Way
State: WA
Zip: 98023

I would really like it if companies would stop trying to poison us unnecessarily!

Thanks!
****

City: Vail
State: AZ
Zip: 85641

Please allow me the choice of chemical free bedding.

I lead a chemical free, healthy lifestyle (organic foods, cotton clothing, organic tampons, discretely dress with no bra, house built without formaldehyde products in my air space, no spraying for bugs, no vaccinations for me hubby or cats, network chiropractic care, vitamins & herbs, aerobic workouts -- these choices are not cheap, but they support my physical and mental health just fine, thank-you. I refuse to use the standard medical system. It's broken.

Now you want to pollute my body more, against my will and without enough data to support this choice. This smacks of pocket lining!!

AT LEAST figure out how to give me the CHOICE. Make me sign a contract or something! Just let me sleep in a chemical free bed.

And getting back to brass tacks ... What ever happened to responsibility? Am I to be forced to sleep in chemicals because someone who smokes can't stay out of bed when they light up? That fire is NO accident!! My mother who smoked for 40 years before quitting (!) NEVER smoked in bed. What a concept.

Chemicals everywhere ... chemical companies and pharmaceutical companies rule, don't they? What a story they must've spun this time for a profit -- (Please, this is my assumption, only -- can't imagine why I'd ever think of this one.)

OK, guess that's it. Pretty simple. This IS America, isn't it?

****

City: NYC
State: NY
Zip: 10016

Profit-driven interests of corporations such as these bed manufacturers and chemical companies often outweigh the health and well-being of individuals. Companies are rarely held accountable for the toxic pollution/off-gassing they create.

I advocate a wider use of the Precautionary Principle, which urges that 'first, no harm be done,' and that Ecological Economics, a more valid measurement which factors in the costs of industrial production to public health, be employed.

The United States is already under obligation to operate by the precautionary principle. The Federal government signed and ratified the Rio Declaration from the 1992 United Nations Conference on Environment and Development. The Rio Declaration says,

"In order to protect the environment, the precautionary approach shall be widely applied by States [meaning nations] according to their capabilities. Where there are threats of serious or irreversible damage, lack of full scientific certainty shall not be used as a reason for postponing cost-effective measures to prevent environmental degradation."

In the case of pending legislation to require flame retardants in mattresses, one can only infer by the extreme rush to legalize them without ANY further scientific study of the harm they [known and suspected carcinogens, pesticides and other poisons] pose to a sleeping population is that their bottom-lines will be positively impacted. Any other altruistic interpretation is sheer naiveté.
****

City: PORT ST. LUCIE
State: FL
Zip: 34983

THAT IS SO DISGUSTING TO PUT ALL THAT JUNK IN THE MATTRESS. I CAN ONLY BUY PLAIN COTTON MATTRESS WITH ORGANIC COTTON THE OTHERS NEVER SEEM TO OUTGAS AND LAST NEW ONE I BOUGHT COULD NOT USE AND GAVE IT AWAY. I NEED TO GET RX FOR THE MATTRESS AND THAT IS ANNOYING TOO. ONE SHOULD HAVE RIGHT TO CHOOSE WHAT IS IN THEIR MATTRESSES. THAT IS ALL CHEMICALS AND ONE DOES NOT EVEN KNOW HOW THE FUTURE WILL BE FOR THE CHILDREN BROUGHT UP ON THIS TOXIC MATTRESSES. PLEASE STOP ALL THAT DISGUSTING CHEMICAL USE. ESPECIALLY IN MATTRESSES.
****

City: Olympia
State: WA
Zip: 98502

I cannot imagine anything more dangerous and ignorant than putting toxic chemicals in our beds! The body runs a detoxification and renewal cycle while we sleep that can only be burdened by yet MORE chemicals being emitted from the bed on which it is resting! Specialty mattress manufacturers have used naturally flame retardant materials such as natural, organic wool for years in safe mattress construction and the industry needs to follow their lead. General fire prevention can be done by other means, but we have no choice but to breathe what is in the air around us wafting out of our mattresses! The proposed law would result in yet another toxic chemical 'experiment' done without informed consent on the human population as a whole while rates of cancer, asthma, and degenerative disease skyrocket and everyone shakes their head in dismay and hides their head in the sand from the fact that we are poisoning ourselves out of existence! In mattress construction as in all other areas the Precautionary Principle must be adopted - a chemical must be proved safe before it is used. Why have chemicals been given the constitutional right of 'innocent until proven guilty' but the constitutional rights of millions of human citizens to 'life, liberty, and the pursuit of happiness' has been denied through the poisoning of our bodies and the disastrous health effects we suffer? Let's get our priorities straight: manufactured products are here to serve people not endanger them. We all have the residue of thousands - if not tens of thousands- of chemicals in our bodies which were unknown in our grandparent's generation. Many are now known to be endocrine disruptors. Our task in this critical hour is to halt and reverse this trend before the damage to the human gene pool is irreversible. We need to make a law FORBIDDING the use of toxic materials in mattresses, not requiring it!
****

Title: Dr.
Degrees: PhD
City: Newark
State: DE
Zip: 19711

I have followed some of the mounting evidence that flame retardants are highly toxic and possibly a significant pollutant in our homes
with far reaching effects on our health.
I know that other countries are moving away from their use and are considering bans. I am simply baffled that at such a time the US legislature moves to pass a law that would make their use mandatory in all mattresses, thereby even robbing people of their free choice.
I sincerely hope that this campaign to stop such irresponsible legislature will be successful!
Thanks.
****

Retailer Comments on Flame Retardant Chemicals in Mattresses
In an effort to fight this law that requires flame retardant chemicals in mattresses I faxed and emailed retailers in the Furniture Industry and asked them to vote on this issue on our website. **All the responses voted against this law.** Some of these retailers also left comments. I omitted the names, phone numbers, and email addresses. Here are some of the comments from Retailers about flame retardant chemicals in mattresses:

Glendale,CA
It would be hard to find another legislative issue where the right thing to do is as intellectually clear as that of reversing the new FR rules.
****

Avondale Estates, GA
Of Course the risk is outweighed! Get a hold of yourself and stop this. How much of this is going on without our knowledge? How many of my friends and family do I have to loose from early deaths due to our lack of knowledge on environmental exposures. Why doesn't the media expose the truths for our safety!!
****

DUNMORE, PA
(*Brand name hidden*) already has "treated cotton" in its Fireblocker mattresses. I was not aware of any of this until I received your fax. I am going to request a MSDS from them.
****

Tarboro, NC
Having suffered from MCS for over 20 years, it is encouraging to see that people are finally beginning to see the cause and effect of adverse exposure to some of the chemicals in our everyday products. We still have a long way to go.
****

Carson City, NV
I have clients who are highly allergic to to any chemicals, as a matter of fact one of my clients was in the hospital with severe asthma because of a chemical in her chair that we had just purchased. I find this absoulutely absurd! I would not want to sleep on a mattress treated in chemicals, especially Boric Acid.
****

Amarillo, TX
Flame retardants may be important, but the chances of injury or death are calculated and probable only if a fire occurs. It seems to me that injury from the use of Boric Acid is inevitable just from sleeping. The risk is FAR too great for me!
****

Whiteville, NC
I definitely don't want anything more toxic added to my home environment!
****

Gahanna, Ohio
This should not be a requirement. It should only be an option.
****

Alexandria , La.

It concerns me greatly that our government is passing laws that could potentially poison me and my family. I would like to know what group of people have been lobbying for this legislation. I'm sure that someone stands to profit greatly by this law and our health is of no concern to them.
****

Westerly, RI
ENOUGH of making the public pay, monetarily and in health, for the cutting of manufacturing costs by the makers. You are making us SICK!
****

Sanibel, Fl
Thanks for the update. We Appreciate the information and will pursue this issue.
****

Essex, MA.
We do not sell mattresses, but we do help our clients find mattresses through retailers. This is bottom line disturbing information, and a horrific dilemma, given the also real danger of flammable mattresses. We vote against this law, which appears to actually increase the risk of total harm to humans,no matter how much it may reduce the risk of harm by fire. Clearly, a slow death or damage by poison is not a preferable choice to a faster death by fire. This is an extension of the chemical sensitivity risk right into people's rest time. What good is all of the 'knowledge' in these risk solutions, if there is no wisdom in any of the research?
****

Virginia Beach, VA
Is this a new form of suicide that the government has development. I for one do not intent to buy any mattresses with deadly chemicals embedded into them. We suffer enough for all the chemical in our food and the air we breath. Now we have to worry about what we are breathing in our sleep. What may be good for the few is lethal to the masses. I have seen what boric acid can do to roaches. Have we all been label roaches to the government now. With the raising cost of healthcare, we have to add respiratory infection to the list of deadly diseases. THIS MUST NOT BE PASS INTO LAW.
****

Columbia, NC
This is ludicrous! Given a choice I would rather perish in a fire than to die a slow death from poisioning. Talk about escalating heath care costs, not to mention those that will have to endure. Where's the reasoning and who's going to financially benefit from this (if allowed to pass) legalized genocide?
****

Wellington, FL
STOP THE MADNESS!
****

Cold Spring Harbor, NY
It makes me sick that this can even happen. I don't understand how this is even legal? It is no wonder why people are always sick with something.
****

Hollywood, Florida
This is an incredibly irrational and dangerous concept. We must not allow this to happen.
****

Barnegat, NJ
It appears to me that someone in government has their priorities confused. We would be jebardizing the health of most of the population to protect insurance companies from lawsuits.

****

Mission HILLS, CA
I AM FIRMLY OPPOSED TO THE NEW FIREPROOFING LAWS. THIS IS AN OUTRAGE. OUR CLIENTS SHOULD HAVE THE CHOICE AND SIGN A WAIVER AS TO WHETHER OR NOT THEY WOULD LIKE TO BE POTENTIALLY EXPOSED TO TOXIC CHEMICALS. THIS NEW LAW MAY EXPOSE THE INDUSRY TO A LOT OF LITIGATION AND LAWSUITS.
****

Cary, NC
Petition, I oppose any and all Flame Retardant Chemicals in Mattresses.
****

Raleigh, NC
The thought of using Boric Acid that would cause the aforementioned afflictions is insane.
****

Haiku, HI
It seems we're always fighting invisible toxins in our modern society. It's discouraging. I tend to be very conscientious about my diet and the types of chemicals etc I use in my household. Nonetheless, I have just been diagnosed with extremely high levels of lead and mercury, and so am particularly sensitive to the topic of toxins in our environment over which we have no control. I hope our votes in this situation will make a difference.
****

Spartanburg, SC
What is the point of risking the many problems on the possible chance of fire? Smoke inhalation will kill before the fire.
****

Avon, CO
We are already exposed to many harmful chemicals daily. Why do we have to sleep with them too.
****

Raleigh, NC
I am MUCH more worried about the certain danger of sleeping on, and indirectly inhaling, poisons designed to kill hardy pests than the potential threat of a fire. It is outrageous that this is being forced on the public unawares! Please do not go forward with the plan to treat all mattresses with boric acid and other such toxic chemicals.
****

Garysburg, NC
How stupid to kill us slowly. The ratio of those who die on burning mattresses to those who spend 8 hours a night for a life time with no fire is quite lopsided. Stop the laws which are really unnecessary.
****

Austin, Texas
There is always a politician anxious to jump into our beds. The excuse this time is to save a few smokers from killing themselves while smoking in bed. Save a few while legislating poison for all. This is a stupid and potentially dangerous law that will not be good for anyone and will add an unnecessary $100 to the cost of bedding.
****

Hickory, NC

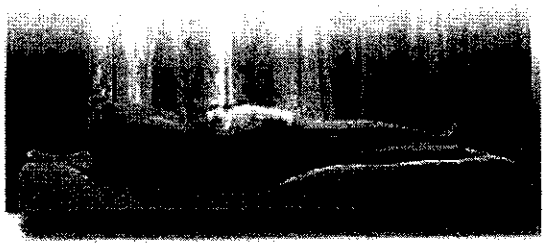
Please do not share my email with any other companies. UNDER NO CIRCUMSTANCES SHOULD THERE BE ANY SUBSTANCES KNOWN TO HARM ANY HUMAN BE PUT INTO A MATTRESS WHERE THE MAJORITY OF US SPEND 1/3 OF OUR ENTIRE DAY!! THIS IS LUDICROUS AND SHOULD HAVE NEVER BEEN AN OPTION. IF CALIFORNIA LAWS ARE SO STRICT THEN LET THEM DEAL WITH THE RISING INSURANCE COSTS ASSOCIATED WITH LONG TERM EXPOSURE. IF MATTRESS COMPANIES FIND IT TO DIFFICULT TO SELL TWO 'DIFFERENT' TYPES OF MATTRESSES, THEN LEAVE CALIFORNIA OUT OF THEIR SELLING LOOP. LOSING CALIFORNIA SALES WILL BE MINIMAL COMPARED TO THE LAWSUITS THAT WOULD ENSUE 5 TO 10 YEARS FROM NOW!!!!!!!!!
****

Radcliff, Ky.
Thank you for making the industry aware of this. There are enough pollutants in our everyday lives without adding more. This is an outrage that the bedding industry would even consider doing this! Please help to keep us informed about the progress of this action. I hope and pray that this can be stopped!
****

Return to Home Page

People For Clean Beds.org

People fighting to keep our mattresses and bedding clean from toxic flame retardant chemicals



"Don't fool yourself. Boric acid _is_ a poison, and a pesticide. It's not 'safe' around children and pets with no further qualification. It's safer than some other pesticides, but only if used in an appropriate manner, which does not include sprinkling it hither and yon. There is no safe substance, only safe use.

The boric acid MSDS (Materials Safety Data Sheet) hazard warning reads:

"WARNING! HARMFUL IF SWALLOWED OR INHALED. CAUSES IRRITATION TO SKIN, EYES AND RESPIRATORY TRACT. AFFECTS CENTRAL NERVOUS SYSTEM, LIVER AND KIDNEYS." A little further along in the MSDS, you'll find: "Adult fatal dose reported at 5 to > 30 grams." 5 grams is about the weight of two pennies, so even though it's not in a class with nicotine, it's not something you want to use with wild abandon. Boric acid is also toxic to aquatic life, so should never be used in a way such that it can wash into surface or ground water."
http://groups.google.com/groups?q=boric+acid+safety&hl=en&lr=&ie=UTF-8&oe=UTF-8&selm=uzzd5.4617%24W06.354105%40sol.newscene.com&rnum=4

(5) "There's an additional problem with boron compounds--they tend to bioaccumulate. So the more often you're exposed, and the higher doses you're exposed to, the more likely you are to have trouble eventually."
http://groups.google.com/groups?q=boric+acid+msds&hl=en&lr=&ie=UTF-8&oe=UTF-8&selm=allyn-0806002137070001%40cornetto.chem.washington.edu&rnum=1

Material Safety Data Sheet, MSDS on Boric Acid

http://www.jtbaker.com/msds/englishhtml/b3696.htm

EFFECTS OF SHORT-TERM EXPOSURE:

The substance irritates the eyes, the skin and the respiratory tract. The substance may cause effects on the gastrointestinal tract, liver and kidneys.

EFFECTS OF LONG-TERM OR REPEATED EXPOSURE:

Repeated or prolonged contact with skin may cause dermatitis. Animal tests show that this substance possibly causes toxic effects upon human reproduction.
http://www.inchem.org/documents/icsc/icsc/eics0991.htm

Under an OSHA Hazard Communication Standard, based on animal chronic toxicity studies of inorganic borate chemicals, boric acid and/or borates are Hazardous Materials. California has identified boric acid as a hazardous waste. The above information is taken from Material Safety Data Sheet (MSDS) 25-80-2320 (Section 2 and 13) supplied by U.S. Borax Inc. (the major supplier of borax to many industries).

The National Academy of Sciences reports that children may be uniquely sensitive to chemicals and pesticide residues because of their rapid tissue growth and development. Most laboratory tests are performed on fully grown adult laboratory animals.

On page 312 of the National Academy of Sciences' report Pesticides in the Diets of Infants and Children (under the section entitled "Non-dietary Exposure to Pesticides") boric acid is cited as one of the pesticides/fungicides that can induce adverse skin reactions such as contact dermatitis and hyperkeratosis with dermal contact of treated surfaces.

Boric acid contained traces of arsenic, a chemical known to the State of California to cause cancer. U.S. Borax was able to use the EPA *de minimus* policy, which accepts that zero is not absolute, but very, very small to remove arsenic from its Material Safety Data Sheet. I personally do not see any risk with the trace amount of arsenic at 1 part per million in boric acid and/or borates if used in an **appropriate** application method. *But, not where there will be constant direct contact*

http://devinefarm.net/rp/rpboric.htm

[Proponents of Boric Acid make a weak argument saying huge quantities are given to mice and attaching the science of Toxicology. Low doses are also tested on mice, rats, rabbits, and dogs. Below is an explanation of this science.] ... Years of experience have shown that toxicity data obtained from a number of animal species can be useful in predicting human toxicity, while predictions based on data obtained from a single animal species may be inaccurate. The second premise is that by exposing animals to large doses of a chemical for short periods of time, we can predict human toxicity due to exposure to small doses for long periods of time.

Toxicology, The Science of Poisons, By University of California, Berkeley
http://devinefarm.net/rp/rpboric2.htm

Children and infants on which boron compounds are used for medication can become acutely ill with nausea, vomiting, diarrhea, circulatory collapse, skin rash and confusion . Fatal poisonings often involve kidney failure. Acute poisonings are rare and are generally associated with deliberate use of concentrated boron products. Other adverse effects that do not include any immediate symptoms of illness can occur when smaller amounts of boron are used on a regular basis. These injuries are not as well known but involve stunted growth (in experimental animals) and infertility in human beings.
http://www.ohd.hr.state.or.us/dwp/docs/fact/boron.pdf

Alternatives to brominated flame retardants

[It appears there are no safe flame retardant chemicals for long-term exposure as in beds. Even with Melamine there is a risk of formation of stones in the urinary bladder.]

Boric acid can be formed, if zinc borate gets in contact with water e.g. body fluids.

Based on comparison with sodium borate and boric acid, respectively, the possible main effects are expected to be:

* Irritation of skin, eyes and throat

* Harm to the unborn child

Harm to the Unborn Child

http://www.mst.dk/default.asp?Sub=http://www.mst.dk/udgiv/publications/2000/87-7944-218-8/html/kap05_eng.htm

Exposure to pesticides is linked with various dysfunctions to human health and the environment. The traditional focus of studies has been on the ability of an agent to cause cancer. But more recent studies are showing that pesticides also can damage the endocrine, neurological and immune systems. Effects can be subtle and can show up decades or generations after exposure, so it is difficult to prove an immediate cause and effect.

The best way to minimize pesticide risks is to avoid use in the first place. Follow the example of the National PTA, which has endorsed minimizing children's exposure to toxic agents. [Talks about general pesticides but conclusions also relate to poisoning mattress]
http://www.ecocitycleveland.org/health/lawn_care.html

Strobel is concerned about the overuse of FRCs. We manufacture Specialty Sleep (New Technology) mattresses that perform better than Innerspring mattresses by providing Clinically Proven Better Sleep, Proven Best Back Support, and 90% Less Tossing and Turning. To learn more about our Patented Supple-Pedic mattresses click here. We are opposed to new regulations that will be detrimental to the comfort and performance of our mattresses, but more importantly we are opposed to these new regulations because we believe they will jeopardize the public health!

Do Flame Retardants Harm Unborn?

http://www.cbsnews.com/stories/2003/09/05/earlyshow/saturday/main571864.shtml

Flame retardant found in breast milk

http://www.drbobmartin.com/2003k_09_23news05.html

Study: Fire Retardants Found In Breast Milk

http://abclocal.go.com/kgo/news/092303ap_nw_breast_milk.html

Full Text of Study: Finds Record High Levels of Toxic Fire Retardants in Breast Milk from American Mothers

The study by the Environmental Working Group backs previous studies that show American women have the world's highest levels of the bromine-based fire retardants, nearing levels that have been shown to damage learning, memory and behavior in laboratory mice.

http://www.ewg.org/reports/mothersmilk/printversion.php

University of Texas School of Public Health and UT Southwestern Medical Center study: (Original Study)

Polybrominated Diphenyl Ethers (PBDEs) in U.S. Mothers' Milk

Arnold Schecter,1 Marian Pavuk,1 Olaf Päpke,2 John Jake Ryan,3 Linda Birnbaum,4 and Robin Rosen 5

1 University of Texas Health Sciences Center, School of Public Health, Dallas Regional Campus, Dallas, Texas, USA; 2 ERGO Research,

Hamburg, Germany; 3 Health Canada, Ottawa, Ontario, Canada; 4 Environmental Toxicology Research Laboratories, U.S. Environmental

Protection Agency, Research Triangle Park, North Carolina, USA; 5 University of Texas Southwestern Medical Center, Department of Obstetrics and Gynecology, Dallas, Texas, USA

http://ehpnet1.niehs.nih.gov/docs/ 2003/6466/abstract.pdf

University of Texas: Studies find mothers' milk carries industrial chemicals

http://www.fox11az.com/scitech/sci/stories/092303dnmetmothersmilk.3f8bd.html

BOSTON -- Two studies reveal that a toxic chemical that makes objects fire resistant is turning up in the breast milk of American women.

http://www.wesh.com/health/2506909/detail.html

Studies have linked some chemicals in the flame retardants to effects on brain function, reduced male fertility and damaged ovarian development

http://www.msnbc.com/news/970665.asp?0cv=HA01

It's not clear how PDBEs enter the body although it's possible they are ingested through dust or by other inhalation at home, the group's study suggested.

Though banned in the late 1970s, PCBs still pollute major waterways. PBDEs are turning out to be as toxic as PCBs

http://www.checnet.org/healthehouse/education/articles-detail.asp?Main_ID=581

PBDEs are remarkably similar to PCBs, a class of chemicals banned in 1976 because it was found to cause immune suppression, altered sexual development, cancer, delayed brain development, lower IQ, and behavioral problems like hyperactivity in humans. As with PCBs, exposure to PBDEs may be particularly harmful during a critical window of brain development

exposure to PBDEs may be particularly harmful during a critical window of brain development during pregnancy and early childhood

North American industry used 74 million pounds of PBDEs in 1999, accounting for half the world market.

http://www.environmentcalifornia.org/envirocaliftoxics.asp?id2=9719

Experience with PCBs shows that failure to act on early warnings can lead to irreversible environmental contamination and damage to health.

Scientists discovered the first indications of systemic harm caused by PCBs as early as 1937. However, PCBs were not banned until 1976, after hundreds of scientific studies documented widespread exposure and actual harm to human health. Further study showed new forms of health impact caused by lower levels of exposure, which continue to be documented decades after the chemicals were phased out.

GROWING THREATS

Toxic Flame Retardants and Children's Health (48 page report)

http://www.environmentcalifornia.org/reports/GrowingThreats03.pdf

Toxic Flame Retardants, As early as 1998, scientists found PBDE levels rising exponentially in women's breast milk.

http://environmentcalifornia.org/envirocaliftoxics.asp?id2=9744&id3=CEtoxics&

High Body Burdens of 2,2´,4,4´-Tetrabromodiphenyl Ether (BDE-47) in California Women

http://ehpnet1.niehs.nih.gov/docs/2003/6220/abstract.html

Polybrominated Diphenyl Ethers in Maternal and Fetal Blood Samples

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1Department of Obstetrics and Gynecology, Indiana University School of Medicine, Indianapolis, Indiana, USA; 2Department of Chemistry and School of Public and Environmental Affairs, Indiana University, Bloomington, Indiana, USA
http://ehpnet1.niehs.nih.gov/docs/2003/6146/abstract.html

The sperm counts of men have dropped by 50%

http://www.wwf.org.uk/chemicals/glossary.asp

PCBs

http://www.acsh.org/publications/reports/pcupdate.html

Study Examines Flame Retardants

http://www.firehouse.com/news/2000/4/28_APflame.html

Antimony oxide is used to produce fire retardants. Breathing or ingesting high levels of antimony for a long time can cause heart and lung problems, joint or muscle pain, stomach pain, diarrhea, vomiting and stomach ulcers.

http://www.epa.state.oh.us/opp/mercury_pbt/fact102.pdf

Swedish study found that a flame retardant

http://www.usatoday.com/news/health/2003-04-23-teflon-usat_x.htm

Swedish institute proposes brominated flame retardants ban

http://www.edie.net/gf.cfm?L=left_frame.html&R=http://www.edie.net/news/Archive/926.html

HALOGENATED FLAME RETARDANTS

http://archive.greenpeace.org/toxics/hfr.html

15 March 1999, KemI proposes a prohibition of flame retardants

http://www.kemi.se/aktuellt/pressmedd/1999/990312_eng.htm

Healthy or Safe Housing

http://www.sccs.com/sccshhos.htm

Approximately 75%was used as a fire-retardant additive under

the name "Dechlorane,"

http://ehp.niehs.nih.gov/roc/tenth/profiles/s115mire.pdf

Brominated Flame Retardants, Background and Issues

http://www.greenstart.org/efc9/bfrs/background.htm

Though the USA has the world's toughest flame retardancy standards, 3,000 people die in fires each year. The Chemical Manufacturers Association estimates the number would be up to 960 higher without such flame retardants

http://www.usatoday.com/news/health/2003-09-22-breast-milk_x.htm

Links to References:

"Demand for flame retardants in the US is projected to increase nearly four percent per year to 1.2 billion pounds in 2005... This assessment of the one billion pound US market for flame retardants..." http://www.marketresearch.com/map/prod/738639.html

"The flame retardant chemicals industry has historically been driven by regulations and standards." http://www.marketresearch.com/map/prod/909190.html

(1) "Government regulations and industry standards obligate manufactures to add flame-retardants to a wide range of products used everyday. Many of these flame retardant products are toxic... The benefits of protecting people from death and property from damage resulting from fires must be weighed against exposure to chemicals that are potentially harmful to human health and the environment." http://www.marketresearch.com/map/prod/924720.html

More Reports http://www.marketresearch.com/map/cat/707.html

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http://www.cbsnews.com/stories/2003/09/05/earlyshow/saturday/main571864.shtml

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http://www.epa.state.oh.us/opp/mercury_pbt/fact102.pdf

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Swedish institute proposes brominated flame retardants ban http://www.edie.net/gf.cfm?L=left_frame.html&R=http://www.edie.net/news/Archive/926.html

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(2) USA Today: "Though the USA has the world's toughest flame retardancy standards, 3,000 people die in fires each year. The Chemical Manufacturers Association estimates the number would be up to 960 higher without such flame retardants"
http://www.usatoday.com/news/health/2003-09-22-breast-milk_x.htm

Political Action Links and Documents

The links below can also be reached at: http://www.strobel.com/law.htm

News Release: New Gov. Regulation Threatens Health

(Click Here, Text (same as this letter) explains implications and how it will become a National standard) http://www.strobel.com/newsrelease.htm

Strobel is concerned about the overuse of FRCs. We manufacture Specialty Sleep (New Technology) mattresses that perform better than Innerspring mattresses by providing Clinically Proven Better Sleep, Proven Best Back Support, and 90% Less Tossing and Turning. To learn more about our Patented Supple-Pedic mattresses click here. We are opposed to new regulations that will be detrimental to the comfort and performance of our mattresses, but more importantly we are opposed to these new regulations because we believe they will jeopardize the public health!

Write or call your legislators, find their email and street addresses below:

California Senators

(Click here) to find the email and street address of your State Senator. Email or call your representative with your concerns. http://www.senate.ca.gov/~newsen/senators/senators.htp

California State Assembly

(Click here) to find the email and street address of your assembly representative. Email or call your representative with your concerns. http://www.assembly.ca.gov/acs/defaulttext.asp

California Governor, State Capitol Building, Sacramento, CA 95814, Phone: 916-445-2841, Fax: 916-445-4633, governor@governor.ca.gov

United States President, E-mail: president@whitehouse.gov Washington Office:1600 Pennsylvania Avenue, NW, Washington, US 20500, Phone: (202) 456-1414, Fax: (202) 456-2461

Congress.org Click here to find all Federal, State, and Local Representatives email, street addresses, and phones. http://www.congress.org

Full text of California Assembly Bill 603

Full Text of California Bureau of Home Furnishings and Thermal Insulation Technical Bulletin 603 (requires pdf viewer) Drawings of test methods at end of document.

Newer Stories and Research links:

From the Los Angeles Times: "... Many say they are dismayed that industry and society have forgotten lessons learned from the toxic legacies of the past. ... 'Didn't we learn from PCBs?'" http://eces.org/articles/000093.php

"... says it's a never-ending battle. Grey says she wants to know how the products get to market in the first place. ... "It's only after they've been using them and that they've exposed humans to these hazards that they say it is dangerous," she says. Both Grey and Dewailly say they wonder why such effects aren't discovered during pre-testing before companies market the products." http://www.cbc.ca/stories/2003/09/17/pollutants030917

Seattle Times, "Potential 'toxic threat': Flame-retardant chemicals ... " http://seattletimes.nwsource.com/html/localnews/2001863781_toxics24m.html

(3) "California's ban did not include Deca because the science was incomplete and the chemical industry argued that Deca molecules were too big to be absorbed by people's bodies. ... "The latest science clearly points to the need for a federal ban of Deca and other toxic flame retardants," said U.S. PIRG's Purvis. "We cannot continue to expose children or adults to harmful chemicals like Deca while we wait for health impacts to develop. Harmful chemicals should not be placed on the market in the first place."
http://www.ems.org/rls/2004/02/18/new_report_finds.html

Quotes from the Consumer Product Safety Commission (CPSC) draft proposal of this new law to flameproof mattresses, statements on health risks. The CPSC document is 381 pages broken down into 6 pdf files and linked below. I urge you to read page 17, and pages 132-169 of the CPSC report. Only 38 pages or 10% of this document are related to health effects of this law.

"Exposure data for antimony, boric acid/zinc borate, and decabromodiphenyl oxide are needed before more definitive conclusions about the potential risk of adverse health effects from these chemicals can be made."

From page 17 of CPSC, http://www.cpsc.gov/library/foia/foia05/brief/mattressespt1.pdf

"CPSC staff has previously provided its opinion that boric anhydride and boric acid are acutely toxic, ... Moreover, it is staff's opinion that boric acid falls within the CPSC's chronic toxicity guidelines issued under the FHSA. It is a probable reproductive and developmental toxicant in humans, based upon sufficient animal data." (Page 148)

[These chemicals that are not yet considered safe are already in millions of mattresses.]

" **Antimony is regarded as a possible inhalation carcinogen.** ... There is limited data to suggest that antimony may be released from a polymer matrix. ... **The results of the limited testing suggest that antimony may be released in measurable quantities from a polymer matrix.** ... the amount of antimony found in a barrier is expected to be higher than in the polyester fabrics ... The amount of antimony migrating from treated barriers is expected to be higher as well." [Antimony Oxide is not chemically bound and could enter our bodies and harm us.]From page 166, http://www.cpsc.gov/library/foia/foia05/brief/mattressespt3.pdf

"Dermal administration in rabbits caused systemic toxicity and even death (Fleming, 1938; Myers et al., 1978). Death was observed in rabbits after a single dermal application of 6.7g/kg in corn oil. ... Fleming et al. (1938) reported systemic toxicity and death after 5-8 days of daily application of dermal applications of an unspecified dose in a paste of artificial acidic or alkaline sweat." (Page 138)[Danish Environmental Protection Agency testing revealed Antimony was released from Modacrylic fibers with sweat. (page 163)] "One human occupational study reported reproductive effects. Menstral cycle disturbances, early interruption of pregnancy, and increased incidence of spontaneous late abortions ... (Belyaeva, 1967) page 140.

This law might save at most one out of one million people. This fire safety law is presumed to save up to 300 lives per year, after 10 to 14 years, after all existing mattresses are replaced. With three hundred million people in the united states this is one out of a million. There are 3000 fire deaths each year and the chemical industry estimates up to 960 are saved by the 1.2 billion pounds of flame retardant chemicals we currently use annually in the US. It may be a high estimate that we will save 10% of the fire deaths from chemicals in mattresses alone. Every life is important but we must also consider the risks. This will expose our entire population to sleeping in known toxic chemicals for the rest of our lives.

The following is from page 17 of CPSC,
http://www.cpsc.gov/library/foia/foia05/brief/mattressespt1.pdf

"Therefore, exposure and risk must be considered in addition to toxicity when assessing potential hazards under the FHSA (CSPC, 1992) ...

[Exposure and risk must be given more weight than it is getting now. I can't think of a worse chemical exposure than the close and intimate contact of mattresses breathing and absorbing these chemicals eight hours a day for the rest of our lives.]

"Data on potential exposures to FR chemicals does not exist. Because of the lack of exposure data a quantitative risk assessment could not be made. Instead, staff conducted a qualitative assessment of the potential risk of health effects from exposure to FR chemicals that may be incorporated to meet the draft proposed standard based on an assessment of available toxicity data, knowledge of how FR chemicals might be used in mattresses, and staff's professional judgment."

[In other words they are guessing. ('qualitative assessment' 'professional judgment') They are guessing about exposing our entire population to known toxic chemical that we will sleep in for the rest of our and our children's lives.]

[This points to the urgent need for independent scientific risk assessments for any and all of the chemicals that will be used in mattresses to meet this law. A professional scientific 'Risk Assessment' will consider the amount of chemical and type and duration of exposure. They will also consider special populations of infants, children, pregnant mothers, fetuses, elderly, people with bedsores, skin rashes, asthma, pre-existing conditions, as well as healthy male and female adults. The lack of scientific quantitative data to prove these chemicals are safe to sleep in would likely cause an independent scientific reviewer to recommend against this chemical use in mattresses.]

The staff believes there are fire retarding methods (e.g., FR-treated barriers) available to mattress manufacturers that are expected to present only a negligible risk of adverse health effects in consumers. This staff opinion is based on the use of polymerized melamine compounds (resins) and vinylidene chloride in the manner described by the manufacturers of the barriers containing these compounds. Exposure data for antimony, boric acid/zinc borate, and decabromodiphenyl oxide are needed before more definitive conclusions about the potential risk of adverse health effects from these chemicals can be made."

[Exactly what is 'negligible risk'? 1 in 10,000, 1in 100,000, 1 in 500,000. This fire law will save at most one in one million people, after ten to fourteen years, when all existing mattresses are replaced, and everyone is exposed. Which is the greater risk?]

[What about the millions of people sleeping in unsafe chemical systems?]

[Another problem with these statements is that they say vinylidene chloride is safe while antimony is not. Later in this document they point out that vinylidene chloride barrier systems also contain antimony. How then is this system safe?]

"CPSC staff will continue to obtain information on the possible techniques the manufacturers will likely use to meet the draft proposed standard, including the specific FR chemicals that will be used, and the amounts applied to specific mattress components. CPSC staff is planning migration/exposure assessment studies on treated mattress components to obtain data needed to quantify the amount of FR chemical that may be released from these mattress components. These data can then be used to more reliably estimate the potential health risks associated with the use of FR chemicals in mattresses."

[Why has this not been done before this standard is proposed? Millions of people are already sleeping in these chemicals. I hope they get this done before this law is passed. It seems CPSC staff is being pressured to rush this law through without adequately considering the risks.]

[I would suggest that when a boric acid mattress is tested that there be a simulated ageing of the mattress to dry out any oils that hold the boric acid powder in place. Perhaps bake it a 150 degrees for a few days or weeks to simulate ageing. Then be sure to agitate the mattress to simulate body movements that push the dead air space inside the innerspring mattress through its surface carrying boric acid dust to the surface for us to breathe and absorb. Then do measurements.]

[How can you accurately predict risks of seventy or more years of close chronic chemical exposure?]

The above is from page 17 of CPSC,
http://www.cpsc.gov/library/foia/foia05/brief/mattressespt1.pdf

Below pages 132 to 169 review the health risks and review the known science.

http://www.cpsc.gov/library/foia/foia05/brief/mattressespt3.pdf I urge you to read these pages. I also urge CPSC staff involved in this law to reread these pages.

Page 143 begins a review of Boric Acid and should be noted that much of the science from the 90's is not included. The EPA toxic review from June 2004 is also not included.
http://www.epa.gov/iris/toxreviews/0410-tr.pdf

Page 147 notes, "No reports of neurological effects were found for boric acid." I think the EPS June 2004 report referenced some. I have seen reports referenced in the ATSDR 1992 report and this report concluded: "Neurological damage is an area of concern following boron exposure." http://www.atsdr.cdc.gov/toxprofiles/tp26-c2.pdf

I have read Boric Acid accumulates in soft tissue and has a half-life of 21 hours, and that it also accumulates in bone with a much longer half-life. Since we are not exposed only 16 hours a day while we are out of our mattress, will a low dose accumulate over months or years?

Exposure assessment begins on page 162

Comments show CPSC is relying on the mattress ticking and mattress pads to reduce chemical exposure.

On page 168, "melamine is reacted with formaldehyde ... **Formaldehyde is a known sensitizer, and is also regarded as a carcinogen.** If melamine-containing products release formaldehyde, sensitization (induction and elicitation of symptoms) may result in some susceptible individuals. ... Staff believes that the mattress ticking should provide a barrier that reduces the potential for contact sensitization."

Our office has had numerous people call and ask about formaldehyde in mattresses as they have very severe reactions from even distant contact. How many people are sensitive to formaldehyde? Is it over a million?

In a 381 page report there are only 38 pages devoted to health risks. We need to be very careful that in our zeal to save a small number from fire that we don't poison our entire population.

I hope CPSC staff will be diligent in assessing health risks. Again I ask for independent 'Risk Assessments.' With enough diligence they may conclude that the risk of exposing our entire population to known toxic chemical in mattresses outweighs the benefit.

People expect the CPSC will protect us, not poison us.

Here are all the links to this document:

http://www.cpsc.gov/library/foia/foia05/brief/mattressespt1.pdf

http://www.cpsc.gov/library/foia/foia05/brief/mattressespt2.pdf

http://www.cpsc.gov/library/foia/foia05/brief/mattressespt3.pdf

http://www.cpsc.gov/library/foia/foia05/brief/mattressespt4.pdf

http://www.cpsc.gov/library/foia/foia05/brief/mattressespt5.pdf

http://www.cpsc.gov/library/foia/foia05/brief/mattressespt6.pdf

People For Clean Beds.org

People fighting to keep our mattresses and bedding clean from toxic flame retardant chemicals

See Links below for full text of California and CPSC new laws:

California mattress Open Flame FR law is already effective, 1-1-05

Notice of Proposed Rule Making, it will become law within a year unless we can stop it.

Federal Register / Vol. 70, No. 9 / Thursday, January 13, 2005 / Proposed Rules 2477, p9 of PDF http://www.cpsc.gov/businfo/frnotices/fr05/openflame.pdf

Consumer Product Safety Commission (CPSC) draft proposal of this new law to flameproof mattresses, and statements on health risks. The CPSC document is 381 pages broken down into 6 pdf files and linked below. I urge you to read page 17, and pages 132-169 of the CPSC report. Only 38 pages or 10% of this document are related to health effects of this law.

Here are all the links to this document:

http://www.cpsc.gov/library/foia/foia05/brief/mattressespt1.pdf
http://www.cpsc.gov/library/foia/foia05/brief/mattressespt2.pdf
http://www.cpsc.gov/library/foia/foia05/brief/mattressespt3.pdf
http://www.cpsc.gov/library/foia/foia05/brief/mattressespt4.pdf
http://www.cpsc.gov/library/foia/foia05/brief/mattressespt5.pdf
http://www.cpsc.gov/library/foia/foia05/brief/mattressespt6.pdf

CALIFORNIA BUREAU OF HOME FURNISHINGS AND THERMAL INSULATION
3485 Orange Grove Ave., North Highlands, CA 95660, (916) 574-2041, Licensing: (916) 574-0280, fax: (916) 574-2043, email: contactbhfti@dca.ca.gov Website: http://www.bhfti.ca.gov/ **TB603** is mattress open flame law, http://www.bhfti.ca.gov/ab603.htm **TB604** is bedclothes open flame law. http://www.bhfti.ca.gov/tb604.htm

Full text of California Assembly Bill 603

Full Text of California Bureau of Home Furnishings and Thermal Insulation Technical Bulletin 603 (requires pdf viewer) Drawings of test methods at end of document

People For Clean Beds.org

People fighting to keep our mattresses and bedding clean from toxic flame retardant chemicals

Our letter to retailers warning of the toxic chemicals in mattresses under the new law got a lot of response. Within four days ISPA (International Sleep Products Association, the innerspring mattress manufacturers association) responded to our letter with a Special Edition Newsletter to their members, for them to use in discussing this issue with retailers.

Their response is standard for proponents. They try to say, they don't use Flame Retardant Chemicals, but inherently flame retardant fibers, that they have done due diligence in researching the safety of these chemicals in mattresses, and that Boric Acid has been widely used in innerspring mattresses for over thirty years. None of these statements are true. Click the underlined links for rebuttals.

ISPA does finally admit they use FRC's. They admit they use Antimony Oxide, but claim it is chemically bound. The CPSC says it leaches out. They admit they use Boric Acid and say it is tightly bound to the cotton fibers, when in fact it exists as loose dust blended with the fibers. For Boric Acid exposure they cleverly omit inhalation exposure, that our CDC says acute dermal exposure does cause health effects, and that it is readily absorbed through damaged skin, and try to tell us we would have to eat our mattress to absorb its poison.

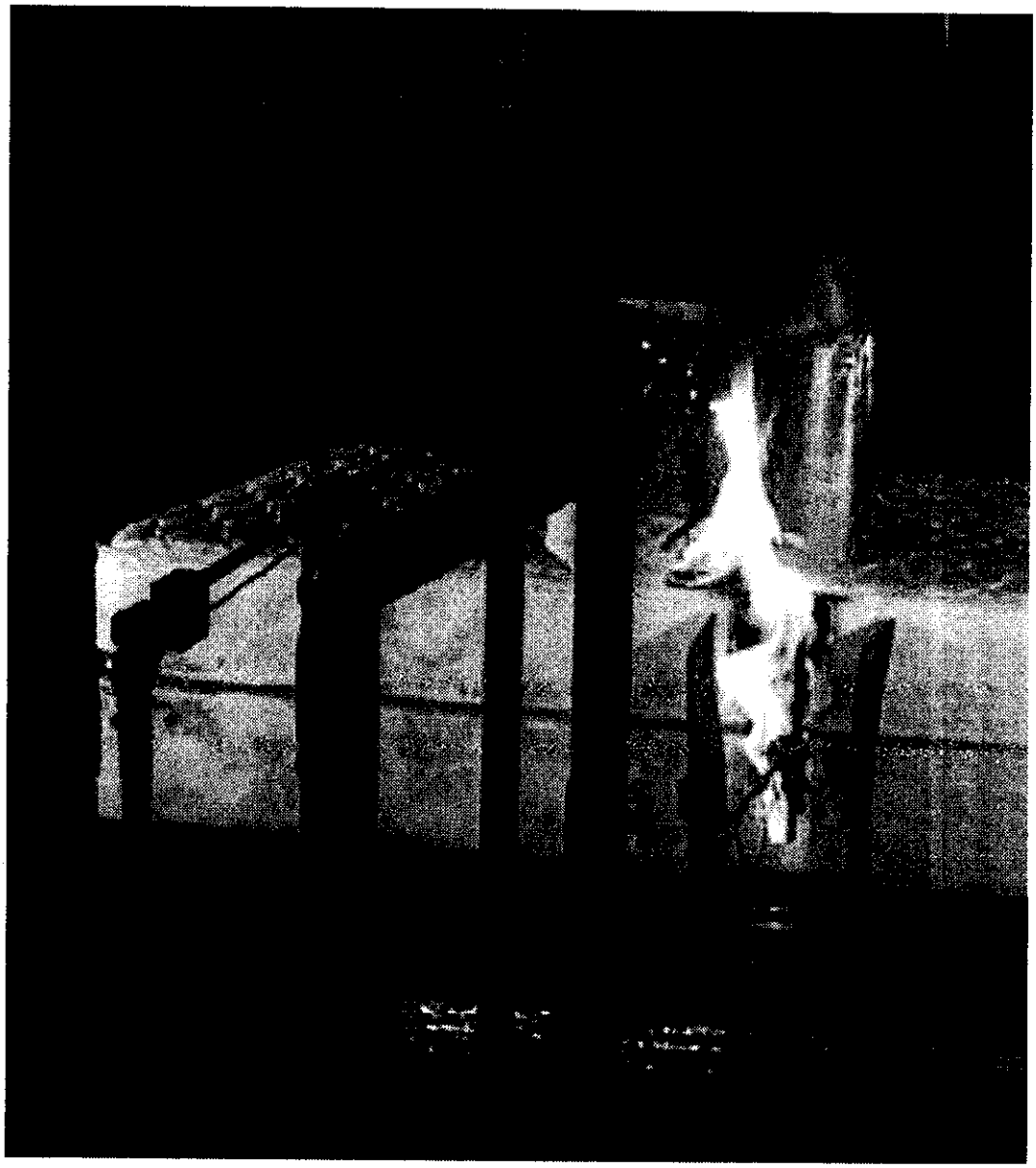
Finally they try to tell us Boric Acid is not poisonous to people because it kill insects differently than it kills humans.

See their Special Edition Newsletter on ISPA's website by clicking this link: *www.sleepproducts.org/...* You need the Adobe Acrobat Viewer.

Then please see our full response.

People For Clean Beds.org

People fighting to keep our mattresses and bedding clean from toxic flame retar



A new California law already effective Jan 1, 2005, and the new federal flamm withstand a 12 inch wide open flame on the side for 50 seconds, and a simulta top for 70 seconds, and then not ignite for thirty minutes, even though a 1973 ignite from a cigarette burning all the way down. To meet this new standard, r under the ticking that is filled with known toxic flame retardant chemicals.

People For Clean Beds.org

People fighting to keep our mattresses and bedding clean from toxic flame retardant chemicals

U.S. CPSC and California will soon require bedclothes not ignite from open flames. This will require chemicals in our mattress pads, sheets, blankets, comforters, and pillows.

CALIFORNIA BUREAU OF HOME FURNISHINGS AND THERMAL INSULATION
3485 Orange Grove Ave., North Highlands, CA 95660, (916) 574-2041, Licensing: (916) 574-0280, fax: (916) 574-2043, email: contactbhfti@dca.ca.gov Website: http://www.bhfti.ca.gov/ **TB603** is mattress open flame law, http://www.bhfti.ca.gov/ab603.htm **TB604** is bedclothes open flame law. http://www.bhfti.ca.gov/tb604.htm These items include comforters, quilted duvet covers, quilted bed pads, bedspreads, bed pillows and bed-rest cushions, mattress pads, quilted bed shams, quilted pillowcases, padded headboards, foam topper pads (covered and bare), etc. The tests do not apply to non-filled bedding items such as blankets, sheets and pillowcases. **(The federal law will apply to these items)**

Here are quotes from: http://www.cpsc.gov/BUSINFO/frnotices/fr05/openflame2.html

[Federal Register: January 13, 2005 (Volume 70, Number 9)]
[Proposed Rules]
[Page 2514-2517]
From the Federal Register Online via GPO Access [wais.access.gpo.gov]
[DOCID:fr13ja05-32]

CONSUMER PRODUCT SAFETY COMMISSION

16 CFR Part 1634

Standard To Address Open Flame Ignition of Bedclothes; Advance Notice of Proposed Rulemaking

AGENCY: **Consumer Product Safety Commission.**

ACTION: Advance Notice of proposed rulemaking.

SUMMARY: The **Commission** is considering issuing a flammability standard that would address open flame ignition of bedclothes. (Commissioner Thomas H. Moore issued a statement, a copy of which is available from the **Commission**'s Office of the Secretary or from the **Commission**'s Web site, www.cpsc.gov.) Elsewhere in today's Federal Register, the Commission is proposing a flammability standard that addresses open flame ignition of mattresses/foundations. Research indicates that in mattress fires the mattress and bedclothes operate together as a system. Thus, the **Commission** believes that a flammability standard for bedclothes in addition to one for mattresses may be appropriate. The **Commission** invites comments concerning the risk of injury identified in this notice, the regulatory alternatives being considered, and other possible alternatives. The **Commission** also invites submission of any existing standard or statement of intention to modify or develop a voluntary standard to address small open flame ignition of bedclothes.

DATES: Comments and submissions must be received by March 14, 2005.

ADDRESSES: Comments should be mailed, preferably in five copies, to the Office of the Secretary, **Consumer Product Safety Commission**, Washington, DC 20207-0001, or delivered to the Office of the Secretary, **Consumer Product Safety Commission**, Room 502, 4330 East-West Highway, Bethesda, Maryland; telephone (301) 504-0800. Comments also may be filed by telefacsimile to (301) 504-0127 or by email to cpsc-os@cpsc.gov. Comments should be captioned ``Bedclothes ANPR.''

FOR FURTHER INFORMATION CONTACT: Margaret Neily, Directorate for Engineering Sciences, **Consumer Product Safety Commission**, Washington, DC 20207; telephone (301) 504-0508, extension 1293.

SUPPLEMENTARY INFORMATION:

A. Background

An existing flammability standard for mattresses addresses ignition of mattresses and mattress pads by cigarettes. 16 CFR Part 1632. On

October 11, 2001, the **Commission** published an advance notice of proposed rulemaking (``ANPR'') addressing open flame ignition of mattresses. 66 FR 51886. That ANPR was the result of several years of evaluation by **Commission** staff and petitions on mattress flammability submitted by Whitney Davis, Director of the Children's Coalition for Fire-safe Mattresses. As explained in the ANPR, the Sleep Products **Safety** Council (``SPSC''), an affiliate of the International Sleep Products Association (``ISPA''), sponsored a research program at the National Institute of Standards and Technology (``NIST''). The NIST research program has provided a great deal of technical information about mattress fires, including the role of bedclothes in such fires.

As noted in the mattress ANPR, mattresses generally are not used alone, but are covered by bedding or bedclothes, whose presence significantly affects the character of the fire. In most incidents a small open flame initially ignites the bedding, and these materials serve as a larger ignition source for the mattress. Because few materials can resist such a large ignition source, the typical approach of preventing ignition of a mattress through a **product** performance standard may not be fully adequate for an open flame mattress standard. Therefore, the **Commission** has taken the approach in

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its proposed mattress standard of limiting the fire intensity in order to minimize the possibility of or delay flashover for a period of time in mattress/bedding fires. Flashover occurs when a fire becomes so intense that all exposed surfaces ignite nearly simultaneously, and the fire quickly spreads through the structure.

In response to the mattress ANPR, the **Commission** received comments both in favor of the **Commission** regulating bedclothes and against such regulation. Those opposed to regulating bedclothes argued that bedclothes are an uncontrolled variable and there is no way to predict the type of bedclothes that may become involved in a fire incident. They also stated that there would be no objective method to determine if consumers were using regulated bedclothes, there is little data indicating that regulating some bedding items would have an impact on the hazard, and flammability performance should not be based on what consumers may (or may not) use as bedclothes. Those in favor of regulating bedclothes argued that bedclothes are a significant ignition source for mattress fires and significantly affect the burning characteristics of the mattress and foundation. They also asserted that bedclothes can generate a fire large enough to pose a hazard on their

own, and that improving the flammability of certain bedclothes, such as filled items, is economically feasible.

As discussed below, the **Commission** believes that regulating bedclothes may be appropriate. Bedclothes contribute substantially to the complexity and magnitude of the mattress fire hazard. The NIST research has shown that, even with mattresses that would meet the **Commission**'s proposed open flame mattress standard, certain bedclothes have produced near flashover conditions in laboratory tests.

B. The Products

The term ``bedclothes'' can include a variety of products, such as sheets, blankets, mattress pads, pillows, comforters, and similar products that are used as covering on a bed. Products that contain fibrous or other materials are called ``filled'' bedding. Because of their greater mass or fuel load, filled products are likely to contribute more significantly to a mattress fire than unfilled products, such as sheets and blankets. California's Bureau of Home Furnishings and Thermal Insulation (``CBHF'') has issued a draft Technical Bulletin 604 that specifies an open flame standard for filled bedding products. The draft TB 604 does not cover textiles, such as sheets, pillowcases and blankets. CBHF only regulates filled bedclothing.

At the present time, the **Commission** is not limiting this rulemaking to any particular bedclothes. The **Commission** intends that during the course of rulemaking it will evaluate continuing research to determine which bedclothes have the greatest impact on mattress fires. The **Commission** requests comments on particular bedclothes that should be included in or excluded from a proposed bedclothes standard.

At the request of CBHF, the American Textiles Manufacturers Institute (``ATMI'') conducted a survey in 2003 of its members about the U.S. market for filled bedding products. The 12 firms surveyed reportedly account for 80% of the U.S. market for these products. Although these firms are located in the U.S., many of their products are manufactured outside the U.S. According to U.S. Department of Commerce 2002 import statistics, perhaps 90% of all quilts and comforters, and perhaps 20% of all bed pillows are imported. According to the ATMI survey, the most common fill material for bedclothes is polyester (not flame-resistant). Some of the improved fill materials being developed for mattresses could also be used for bedclothes. Use of barrier fabrics or flame resistant outer fabrics are other approaches that could be used to improve fire performance of

bedclothes.

A trade publication, ``Home Textiles Today,'' reported in its 2003 annual business issue that the top five firms marketing comforters and bedspreads sold about $1.1 billion in the U.S. in 2002, essentially unchanged from 2001. The top five makers of down comforters reported sales of about $303 million in 2002.

Mattress pads are constructed of the same types of foam used in mattresses and filled bedding products. They can also contribute significantly to mattress/bedding fires. Foam mattress pads may be made with a flat surface, an ``egg crate'' design, or with ``memory foam'' that contours to the body. Egg crate pads retail for $10 to $50 each. Industry sources estimate that perhaps 4 to 5 million egg crate pads are sold annually. Memory pads, which retail for $100 or more, sell about 3 million units annually.

C. Risk of Injury

The most recent national fire loss estimates indicated that mattresses and bedding were the first items to ignite in 19,400 residential fires attended by the fire service annually during 1995-1999 (based on data from the U.S. Fire Administration's National Fire Incident Reporting System data and the National Fire Protection Association's annual survey). These fires resulted in 440 deaths, 2,230 injuries and $273.9 million in property loss each year. Open flame ignition sources accounted for 35 percent of these fires and smoking material sources accounted for 30 percent of the fires. The remaining fires included a variety of ignition sources including heat sources too close to the bed. Based on these data alone, it is very difficult to determine whether the first item ignited was a mattress or an item of bedclothes.

The primary source for information on the involvement of various bedclothes items in mattress fires is CPSC's in-depth investigations. Staff analyzed 241 investigated fire incidents that occurred between January 2000 and June 2003. These investigations were based on a variety of initial sources, NEISS hospital emergency room reports, newspaper clippings, and fire department reports.

Unless someone witnessed the fire ignition, it was often difficult to determine whether the mattress or a bedclothes item, such as a pillow or blanket, ignited first. When the initial ignition was not observed and reported, staff determined what ignited first based on the reported scenario. For example, if a lamp fell on a blanket on the top surface of the bed, the incident was classified as igniting the blanket

first. Based on this evaluation, it was determined that a non-electric bedclothes item ignited first in 190 of 235 fires (81 percent). However, in 75 percent of those bedclothes' ignitions it was not possible to determine the type of bedclothes involved. Among incidents for which a specific item was reported, sheets, blankets, and comforters/quilts were the items cited most frequently. Ignition sources included cigarette lighters (primarily children playing), candles, smoking materials, and other nearby heat sources. Although the investigations could not provide information on which types of bedclothes were more likely to ignite, they did show that most bedclothes items that were present did ignite at some point during the fire.

D. Statutory Provisions

Section 4 of the Flammable Fabrics Act (``FFA'') authorizes the **Commission** to initiate proceedings for a flammability standard when it finds that such a standard is ``needed to protect the public against unreasonable risk of the occurrence of fire leading to death or personal injury, or significant property damage.'' 15 U.S.C. 1193(a). That section also sets forth the process

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by which the **Commission** can issue a flammability standard. The **Commission** first must issue an advance notice of proposed rulemaking (``ANPR'') which: (1) Identifies the fabric or **product** and the nature of the risk associated with the fabric or **product**; (2) summarizes the regulatory alternatives under consideration; (3) provides information about existing relevant standards and reasons why the **Commission** does not preliminarily believe that these standards are adequate; (4) invites interested persons to submit comments concerning the identified risk of injury, regulatory alternatives being considered, and other possible alternatives; (5) invites submission of an existing standard or portion of a standard as a proposed regulation; and (6) invites submission of a statement of intention to modify or develop a voluntary standard to address the risk of injury. 15 U.S.C. 1193(g).

If, after reviewing comments and submissions responding to the ANPR, the **Commission** determines to continue the rulemaking proceeding, it will issue a notice of proposed rulemaking. This notice must contain the text of the proposed rule along with alternatives the **Commission** has considered and a preliminary regulatory analysis. 15 U.S.C.

1193(i). Before issuing a final rule, the **Commission** must prepare a final regulatory analysis, and it must make certain findings concerning any relevant voluntary standard, the relationship of costs and benefits of the rule, and the burden imposed by the regulation. Id. 1193(j). The **Commission** also must provide an opportunity for interested persons to make an oral presentation before the **Commission** issues a final rule. Id. 1193(d).

E. Existing Open Flame Standards

Currently, there are no mandatory flammability requirements for residential bedclothes in the United States. A few voluntary standards apply to bedding items. ASTM D4151-92 (2001) measures ease of ignition and surface flame spread of blankets. Underwriters Laboratories (``UL'') has a standard for electric blankets. A European standard, ISO 12952--Textiles--Burning behaviour of bedding items, Parts 1-4, specifies a general test method for assessing the ignitability of bedding items. The test method calls for observation of progressive smoldering and/or flaming when a bedding specimen is exposed to a small propane burner. The test relates only to ignitability of the bedding material under the specific conditions of the test. None of these tests appears adequate to measure or address the specific hazard posed by a bedclothes item or its contribution to a residential mattress/bedding fire.

F. California's Rulemaking

In 2001, the California legislature passed Assembly Bill 603 (``AB 603''), which mandated that CBHF issue regulations by January 2004 that would require that mattresses and box springs meet a test for open-flame resistance. AB 603 also stated: ``If the bureau [CBHF] concludes that other bedding contributes to mattress fires, the regulations shall require the other bedding to be flame retardant under the resistance to open-flame test.'' Based on their own research and that conducted by NIST, CBHF determined that regulation of filled bedding products--such as comforters, pillows, and mattress pads--is necessary. CBHF has been working with a multi-disciplinary task force to develop a proposed standard for these bedding items. CBHF prepared a draft standard (TB 604) that was discussed in the Task Force in 2003. However, it was withdrawn because of technical problems with the test method. CBHF issued a new draft of the TB 604 standard on October 1, 2004, and scheduled a Task Force meeting for November 18, 2004, to discuss it.

CBHF has stated that it expects to open formal rulemaking at the end of the year and hold hearings on the proposal in January or February 2005.

G. Technical Research on Bedclothes

As discussed in the mattress ANPR, several research projects have examined open-flame ignited mattress and bedding fires. Some of this research provides a better understanding of the contribution of bedclothes to these fires.

The Sleep **Product Safety** Council (``SPSC'') sponsored several phases of research at NIST. One of the focuses during Phase 1 was to evaluate the fire behavior of various combinations of bedclothes. Twelve different combinations of bedclothes sets ranging from very light (two sheets and a pillow) to heavy (two sheets, a pillow, a mattress pad, one blanket, and one heavy weight filled comforter) were burned on an inert, twin-size mattress made of fiberglass. The peak heat release rates varied from 50kW to 200kW. Combinations without a comforter were typically under 100kW. Peak heat release rate is basically a measure of the intensity of the fire produced by these items. Further tests were conducted on a range of combinations of bedclothes.

Part of Phase 2 of the NIST work included a limited assessment of bedclothes and their contribution to mattress fire hazards. The same set of bedclothes was used on mattresses of varying heat release rate performance. The bedclothes were tested with a king sized mattress that had contributed very little heat release rate in prior testing without bedclothes. The result was a peak heat release rate of 400kW, primarily from the bedclothes. While this scenario would not readily cause flashover, it is important to note that this result assumes little involvement from the mattress.

SPSC expanded its research at NIST to examine filled bedclothes (such as comforters, pillows, and mattress pads). This research tested bedclothes constructed of a variety of filling and cover materials to assess the effect of material changes on the flammability behavior. The study evaluated two design changes: One involved replacing polyester fiberfill with a modified, lower heat release fiber of a comparable loft; the other involved using a barrier-type cover to protect the polyester fiberfill. These design changes were examined using three different mattress and foundation designs: One representing current mattress/foundation construction and the other two using experimental, improved designs.

The report on this bedclothes study was published in February 2003,

NIST Technical Note 1449. According to the NIST report, for a mattress standard to be most effective, the performance of the entire bedding system (that is, the mattress/foundation and the bedclothes) must be taken into consideration. The study showed that the bedclothes and the mattress/foundation function as a system and that the improved mattress pads, pillows and comforters resulted in major improvements in the performance of the system. This was indicated by a lower peak heat release rate or a longer time to peak.

A related research project conducted for CPSC by NIST reinforced one of the conclusions of the bedclothes study discussed above. A portion of the tests using conventional bedclothes showed that, as mattress designs improve, two separate peak heat release rates occur. The first observed peak appears to be dominated by the bedclothes, while the second is dominated by the mattress/foundation. Good mattress designs tended to have a peak heat release rate appreciably later in the test and comparable to or less than the peak dominated by the bedclothes.

A more recent study conducted for CPSC by NIST included a series of tests using the same bedclothes combination on twin, queen, and king size mattresses. The tests were conducted in

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a room environment to evaluate any resulting room effects, which generally begin to occur at heat release rates of about 300 to 400kW. The early heat release rate peaks, driven primarily by burning bedclothes, tripled from twin size to king size. Larger size bedclothes combinations on good performing mattress designs (those with peak heat release rates less than 50kW when tested with burners and no bedclothes) showed heat release rate peaks up to 800 kW, occurring 7 to 8 minutes after ignition. This is much higher than rates allowed for mattresses/foundations under CPSC's proposed mattress standard. On mattress designs that yielded a moderate heat release rate peak with burners, the bedclothes resulted in more serious fires. This study shows that a combination of some bedclothes with even a well performing mattress/foundation (that would meet CPSC's proposed mattress standard) could still cause flashover in a room.

H. Invitation To Comment

In accordance with section 4(g) of the FFA, the **Commission** invites comments on this notice. Specifically, the **Commission** invites the

following types of comments.

1. Comments concerning the risk of injury identified in this notice, the regulatory alternatives discussed above, and other alternatives to address the risk of injury;

2. The submission of an existing standard or portion of a standard as a proposed rule;

3. The submission of a statement of intention to modify or develop a voluntary standard to address the risk of injury identified in the notice along with a description of a plan to modify or develop the standard.

In addition, the **Commission** is interested in obtaining further information about the following issues that may influence the flammability of bedclothes.

1. Cleaning and laundering methods of bedclothes;

2. Frequency of cleaning or laundering of various bedclothes items over their useful lives.

Dated: December 22, 2004.
Todd Stevenson,
Secretary, **Consumer Product Safety Commission**.

List of Relevant Documents

1. Briefing memorandum from Margaret Neily, Project Manager, Directorate for Engineering Sciences, to the **Commission**, ``Notice of Proposed Rulemaking for Mattress Flammability (Open Flame) and Options for Addressing Bedclothes Involvement in Mattress/Bedding Fires,'' November 1, 2004.

2. Memorandum from Linda Smith, EPHA, to Margaret Neily, Engineering Sciences, ``Involvement of Bedclothes in Residential Fires Mattress Fires,'' May 2004.

3. Memorandum from Terrance R. Karels, EC, to Margaret L. Neily, ES, ``Bedding Market Information,'' October 5, 2004.

4. Memorandum from Allyson Tenney, ES, to Margaret Neily, Project Manager, ``Bedclothes Flammability,'' October 29, 2004.

[FR Doc. 05-415 Filed 1-12-05; 8:45 am]
BILLING CODE 6355-01-P

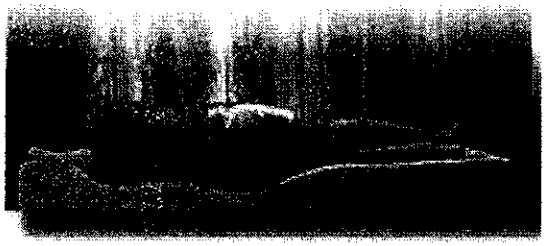
People For Clean Beds.org

People fighting to keep our mattresses and bedding clean from toxic flame retardant chemicals

Political Action Links and Documents

News Release: New Gov. Regulation Threatens Health, Environment, and Costs every Consumer $100-$200+

(Click Here, Text explains implications and how it will become a National standard)



We are opposed to these new regulations because we believe they will jeopardize the public health!

Write or call your legislators, find their email and street addresses below:

Congress.org Click here to find all Federal, State, and Local Representatives email, street addresses, and phones. http://www.congress.org

California Senators

(Click here) to find the email and street address of your State Senator. Email or call your

representative with your concerns. http://www.senate.ca.gov/~newsen/senators/senators.htp

California State Assembly

(Click here) to find the email and street address of your assembly representative. Email or call your representative with your concerns. http://www.assembly.ca.gov/acs/defaulttext.asp

California Governor, State Capitol Building, Sacramento, CA 95814, Phone: 916-445-2841, Fax: 916-445-4633, governor@governor.ca.gov

United States President, E-mail: president@whitehouse.gov Washington Office:1600 Pennsylvania Avenue, NW, Washington, US 20500, Phone: (202) 456-1414, Fax: (202) 456-2461

Full text of California Assembly Bill 603

Full Text of California Bureau of Home Furnishings and Thermal Insulation Technical Bulletin 603 (requires pdf viewer) Drawings of test methods at end of document.

People For Clean Beds.org

People fighting to keep our mattresses and bedding clean from toxic flame retardant chemicals

You should ask CPSC commissioner Hal Stratton if he has read, or is choosing to ignore the warnings of his own health sciences division. He is pushing this law through as fast as possible. When asked about the health dangers of the chemicals used the CPSC responds: Americans are already exposed to over one billion pounds of additional flame retardant chemicals every year. The logic being that our now sleeping in these chemicals won't hurt us. (Doctors are already concerned about our toxic load.) Then they state that other government agencies are responsible for banning harmful chemicals. (As the say in the pesticide industry, "there are no safe chemicals, only safe use.") Finally they say study will be ongoing, meaning that we are going to test our entire population. Then if we find we have harmed people that specific chemical will be banned. From what our science knows and tells us about the risks of these chemicals it seems likely we will eventually find human harm. Then it will be too late! How many millions of people will we kill or harm? If it is only 15% of the population it will be 45 million people. This chemical exposure in mattresses literally touches everyone; it has the potential to be our largest public health disaster ever.

Comments will be received by OMB until March 14, 2005. **ADDRESSES:** Comments should be filed by email to *cpsc-os@cpsc.gov*. Comments also may be filed by telefacsimile to (301)504–0127 or mailed, preferably in five copies, to the Office of the Secretary, Consumer Product Safety Commission, Washington, DC 20207–0001, or delivered to the Office of the Secretary, Consumer Product Safety Commission, Room 502, 4330 East-West Highway, Bethesda, Maryland; telephone (301) 504–7530. Comments should be captioned "Mattress NPR."

http://www.cpsc.gov/businfo/frnotices/fr05/openflame.pdf

Please also vote and leave your comments with us at Vote-Poison in Beds, and Join our organization for free.

People For Clean Beds.org

People fighting to keep our mattresses and bedding clean from toxic flame retardant chemicals

Response to ISPA's defending Boric Acid and other chemicals in mattresses

The Consumer Products Safety Commission also disagrees with ISPA and warns Boric Acid and Antimony Oxide are not safe to use in mattresses. Please also see Quotes-CPSC.htm

Millions of People are already sleeping in new mattresses with a pound or more of a poisonous pesticide, Boric Acid, in the surface of the mattress, to make it flameproof. A new law will soon have all of us sleeping in poison.

Background: On Monday Nov. 8, Mark Strobel, faxed and emailed, a letter to 17,192 furniture retailers warning of the health dangers of chemicals being added to the surface of new mattresses to make them flameproof. They are using Antimony Oxide (linked to cancer, liver, and heart damage) and Boric Acid (a pesticide that is poison to humans, and the EPA links it to sterility, fetal death, and birth defects). This letter got a lot of response with many retailers voting at our website and making comments against this chemical use and new law. Many more retailers asked their mattress suppliers what is going on? By Friday Nov. 12, ISPA (Innerspring Mattress Manufacturers Association) issued a Special Edition Newsletter in response to Mark's letter. This newsletter glossed over, omitted, and misstated the key issues of public health dangers. **They do admit they use Antimony Oxide and Boric Acid to flameproof mattresses** and defend this use. Please see the letter I sent retailers, the whole story, a cutaway photo of how over a pound of Boric Acid is being used in mattresses, retailer and leading doctor quotes on this issue at www.Strobel.com/vote.htm This law is effective Jan 1 in California and is being enacted nationwide by the CPSC.

Mark Strobel's response to: ISPA (International Sleep Products Association), Special Edition Newsletter, November 12, 2004 written by Richard M. Doyle, President.

Doyle:
"What about the recent questions regarding the safety and toxicity of some materials being used to meet the new flammability standards? These statements are irresponsible, and are based on reports that are outdated ... "

Strobel:
Doyle should read my report before he accuses me of making irresponsible statements based on outdated

reports. A cotton-batting manufacturer wrote me they rely on reports from 1968-1972 to justify their use of Boric Acid in cotton batting. They admit the safety question comes up regularly every year. Perhaps Doyle is not fully informed on these issues.

I quoted: A June 2004 report by the EPA, 'Toxicological Review of Boron and Compounds,' and, The Agency for Toxic Substances and Disease Registry (ATSDR) a division of the Center for Disease Control (CDC), [Health Effects of Boric Acid] (this report is quoted by the EPA 2004 report) a July 1992 report. An MSDS on Antimony Oxide dated 5-8-03. Boric Acid Material Safety Data Sheet (MSDS) dated 3-3-2004. And more. I was very careful to be truthful in my report. It is well documented with links to my quotes where you can easily see the dates. These reports never anticipated we would put a pound or more of Boric Acid in the surface of our mattresses. Please read my report and check references at www.strobel.com/newsrelease.htm

Doyle:
"What about the specific materials that the critics have attacked?

Modacrylic Fiber: Some mattress manufacturers use materials made from Modacrylic fiber, which contains Antimony Oxide ..."

Strobel:
Here are some quotes from the MSDS on Antimony Oxide:

"Potential Health Effects
... May cause heart to beat irregularly or stop. ...
Chronic Exposure:
Prolonged or repeated exposure may damage the liver and the heart muscle. Prolonged skin contact may cause irritation, dermatitis, itching, and pimple eruptions. There is an association between antimony trioxide production and an increased incidence of lung cancer." see it yourself at:
http://www.jtbaker.com/msds/englishhtml/a7236.htm

The CPSC reports Antimony Oxide is not chemically bound and is released from Modacrylic fibers. Please also see Quotes-CPSC.htm

Doyle:
Boric Acid-Treated Cotton Fiber: Another popular fire retardant material that has been safely used for years is cotton treated with boric acid."

Strobel:
"In the past, boric acid was used as a topical treatment for infants with diaper rash. However, even in diluted (3%) form it caused significant toxicity and two deaths."

Doyle omits many things: **Inhalation**, Boric Acid is absorbed through inhalation. Inhalation and Ingestion are considered synonymous in toxic research, except less chemical is required to reach toxic levels than through ingestion. We breathe at the surface of our mattress eight hours per day for the rest of our lives. It is also "Readily absorbed through damaged or burned skin." We don't have to eat our mattress to absorb Boric Acid.

"EPA has determined, ... use of the substance without dermal protection may result in serious chronic and developmental effects." (EPA)

We know Boric Acid is poison to humans and now we know even more. Here are a few quotes from the conclusions of an EPA document (real science, not speculation):
www.epa.gov/ncea/pdfs/boron/tox_review_boron.pdf

"6.1. HUMAN HAZARD POTENTIAL, June 2004

Studies in laboratory animals conducted by oral exposure have identified **the developing fetus and the testes as the two most sensitive targets of boron toxicity** in multiple species (Weir and Fisher, 1972; Seal and Weeth, 1980; NTP, 1987; Fail et al., 1991; Price et al., 1996a,b; Field et al., 1989).

The developmental effects that have been reported following boron exposure include **high prenatal mortality, reduced fetal body weight and malformations and variations of the eyes, central nervous system, cardiovascular system, and axial skeleton** (Price et al., 1996a,b; Field et al., 1989).

The testicular effects that have been reported include **reduced organ weight and organ:body weight ratio, atrophy**, degeneration of the spermatogenic epithelium, impaired spermatogenesis, **reduced fertility and sterility** (Weir and Fisher, 1972; Seal and Weeth, 1980; NTP, 1987; Fail et al., 1991; Dixon et al., 1979; Linder et al., 1990; Treinen and Chapin, 1991; Ku et al., 1993). [The EPA reports they have high confidence in these studies] http://www.epa.gov/iris/toxreviews/0410-tr.pdf

Doyle:
[Boric Acid] "wears off through use only in harmless miniscule amounts."

Strobel:
We know the developing fetus is unusually susceptible to this toxin. Exactly how miniscule an amount would a pregnant mother have to breathe eight hours every night to harm her unborn child?

A cotton batting manufacturer told me they rely on reports from 1968-1972 to justify their use of Boric Acid in cotton batting. They admit the safety issue comes up regularly every year. I am shocked we ever justified this use; even thirty years ago we knew Boric Acid is poison to humans. This treated cotton has been used in a relatively limited number of mattresses so far. I saw where it is used in some prison mattresses. Our science of the last 30-years warns Boric Acid can do damage to humans with no external symptoms: Liver, Kidney, and Neurological damage, "Demonstrated injury to the gonads and to the developing fetus," High prenatal mortality, birth defects, reduced fertility, and sterility. We may have already harmed people and not know it.

The science of toxicology uses high dose short-term exposure on various animals to predict the affect of low dose long-term exposure on humans. This is exactly the risk in mattresses, close, low dose, and long-term exposure.

From the MSDS: http://www.rosemill.com/html/msds/chem_boric_acid_msds.pdf "**Inhalation:** Causes irritation to the mucous membranes of the respiratory tract. ... Could result in the development of nausea, vomiting, diarrhea, drowsiness, rash, headache, fall in body temperature, low blood pressure, renal injury, cyanosis, coma, and death. ... **Skin Contact:** Causes skin irritation. Not significantly absorbed through the intact skin. Readily absorbed through damaged or burned skin. ... **Chronic Exposure**: Prolonged absorption causes weight loss, vomiting, diarrhea, skin rash, convulsions and anemia. Liver and particularly the kidneys may be susceptible." Persons with pre-existing conditions may be more susceptible to this poison.

From other sources including EPA and CDC: "Does cause health effects following acute dermal exposure." Linked to dermatitis. "Has been shown to cause irritation of the upper respiratory tract in humans." "Demonstrated injury to the gonads and to the developing fetus." "Neonatal children are unusually susceptible to boron exposure." Children are more susceptible to toxic agents and pesticide residues. Pesticides have been linked to stillbirths. "Boron does accumulate in bone." EPA is concerned our exposure could already be excessive through food, cosmetics, medicines (eyewash?), and insecticides. (They have not considered exposure in mattresses) EPA is concerned about environmental damage in concentrations as low as 300 parts per billion. "Elemental boron is not found in nature." Boric Acid exists

as loose dust mixed in with the cotton fibers. **I disagree that a pound and a half or more of Boric Acid dust in the surface of a Queen mattress is a small amount.** It's true we don't know of killing anyone yet from this use. But we may soon find damage as this issue is raised. At least one asthma suffer has reported he can't sleep on a Boric Acid mattresses because it causes difficulty for his breathing. The real issue is not killing healthy adults. Boric Acid can do damage with no external symptoms. Recent science gives strong warnings of Reproductive, Neurological, and Developmental damage. It is very clear Boric Acid is poison. People have suffered all sorts of ill effects and permanent damage, including death. Why do we want to sleep in poison?

Doyle Concludes:
"While Boric Acid is an effective and preferred pesticide because it interferes with an insect's digestive abilities, it does not have this same effect on humans or mammals and does not harm the environment."

Strobel:
Doyle tries to infer it's not poison for humans. Boric Acid does not kill humans and mammals the same way it kills insects. Our science knows how it harms us. The EPA and CDC say the developing fetus and the testicles are the most sensitive targets of Boric Acid. It results in high prenatal mortality and birth defects. Boric Acid exposure attacks and shrinks the male genitals. Infertility, Sterility, Neurological (Brain) damage, we also know it attacks the liver and particularly the kidneys. All of these things can happen with no external symptoms and we would never know it is related to Boric Acid.

It's time for ISPA to quit arguing we have always done it that way. There is a ton of new science in the last thirty years that warns of huge risks from sleeping in Boric Acid. We knew it was poison 30-years ago. We should have had the common sense to have never used it in the first place.

Doyle:
"What kind of safety "due diligence" has the industry performed in meeting the new standard?
... In developing mattresses to meet the new flammability rules, mattress manufacturers and component suppliers have researched various types of human exposure, including skin contact and absorption, inhalation and ingestion."

Strobel:
This is a very broad statement that they have done all this testing. Did they use laboratory animals or humans? Are there chronic exposure studies of six months or more? Is this research adequate to predict it

is safe for all of us to sleep in these chemicals with full body and breathing contact eight hours a day for the next thirty years or more? Where is this research? I can't find any. I have poured over ISPA's web site and all I find is tests of burning mattresses, nothing on human exposure. I can't find anything anywhere that supports this as safe use. I don't think this research exists! If Mr. Doyle can produce it I would love to see it. I question the industry's "Due Diligence" I question if they have even read a Material Safety Data Sheet (MSDS) on the chemicals they choose. The only North American Modacrylic fiber supplier admits -- There is no toxicological research! I did find a National Cotton Batting Institute (NCBI) web page that makes a weak case for Boric Acid exposure in cotton. (see Boric Acid Rebuttals in my full report) They do admit, "the question of Boric Acid safety comes up regularly every year." It should! Perhaps we can finally resolve this question. Modern science gives us strong warnings this is not safe use. **I have leading doctors, MD's, who specialize in environmental medicine. This type of chemical exposure in mattresses is their field; they oppose these chemicals in mattresses.** What doctors does ISPA have who say these systems to fireproof mattresses are safe for our entire population to sleep in for the rest of our lives?

A **'Society of Toxicology'** News Release reports:

... **However, more must be known about the toxicology of these chemicals before manufacturers use them to meet new fire safety standards. ...** Some scientists report that the chlorinated phosphate esters may be carcinogenic, and that **boric acid may be a reproductive toxicant for male children.** The manufacturers of these chemicals state that their products are safe when used as intended. **To date, none of these claims has been thoroughly assessed by credible, independent scientists.**

In spite of the above warnings, the innerspring mattress industry is charging ahead and already putting these chemicals in millions of mattresses nationwide, even though they have been warned it may not be safe for human exposure. The above news release was reported in Furniture Today, the leading trade magazine. International Sleep Products Association (ISPA) has not even done a simple independent risk assessment that reviews known science and factors in amount and duration of exposure, on any of the chemicals they are putting in mattresses, even though one could be had for ten to twelve thousand dollars. I don't think any of the chemicals they are choosing would pass a risk assessment.

Doyle:
"Why does the industry support new mattresses flammability standards?

Strobel:

A little more than a year ago I had a conversation with Mr. Doyle. I was shocked to hear him tell me they went to the CPSC and asked for this law. Why I asked? He gave me the standard answer and added **"it**

will help to keep imports out" and "this is what the members wanted." While I am no fan of imports either, I quickly realized it would do more than just hurt imports. It would also hurt the smaller manufacturers and particularly the Mom & Pop factory direct manufacturers who sell directly to the public out of a storefront. It would also put specialty sleep products at a disadvantage to comply since many use thin non-quilted covers to attain maximum comfort and most use zippered covers for access to components. ISPA members pay dues based on their sales volume. So it should be easy to see who controls ISPA. It is not unusual for industry groups to ask for regulations that protect their turf and restrain competition.

ISPA has pushed very hard for this law. Why would an industry group ask for more government regulation? I can only speculate. Perhaps their interests are pure and they are only concerned about public safety. Or, do they have other reasons that serve their self-interest? The innerspring mattress industry has seen their market share decline as specialty, newer technology, beds have recently grown to over twenty to thirty percent of the market. It might be easier and less costly to protect metal wire coil spring mattresses from fire than it is for other types of mattresses such as Visco-Elastic, Foam, Air, or Latex mattresses. Are they thinking that testing costs to comply will drive many of their smaller competitors out of business? Are they thinking that since everyone's costs and prices will go up that they will earn more revenue and profit on the same number of unit sales? Do they see this as a win-win-win for themselves that keeps people sleeping on metal wire innerspring mattresses that were invented in 1871, increases profits, and squashes specialty and smaller competition? As Doctor Rapp said: "Follow the money trail to see the real reason for this law."

Retailers and Manufacturers should be very careful which chemicals they choose for the mattress surface. While we know the most about boric acid right now, one of these other chemicals might turn out to be worse. The human risk parallels the legal risk. Most businesspeople are happy it they can make the right decisions 51% of the time. If we make the wrong decisions now on this choice, we may regret it later. If we find years from now we have done human damage, lawyers will be advertising on television looking for victims. Retailers and Manufacturers may be sued by millions of people.

How Millions of People are already sleeping in poison, and how to know
Some mattresses manufacturers are putting these chemical systems, and particularly Boric Acid, in all their mattresses nationwide in anticipation of the new law. A cotton-batting manufacturer who is supplying 'Treaded Cotton' to mattress manufacturers to meet the new law told me, it contains both Modacrylic fibers (with Antimony Oxide) and Boric Acid! Other systems use Modacrylics with Polyester quilted into the surface. Retailers and Consumers can at least avoid Boric Acid systems. Check the law label, the little white tag that says do not remove under penalty of law. If the tag says the mattress contains 'Treated Cotton', it's likely Boric Acid.

If retailers and consumers oppose this law we are going to have to fight this ourselves.

Conclusion

Most people don't want to sleep in chemicals. They have learned commonsense from the toxic legacies of the past. PCB flame-retardants were banned in the 70's after much environmental and human damage that continues to this day. Some researchers believe today's ADHD children are the result of PCB's. We learn to late the lessons of Asbestos. Another flame retardant was banned from children's sleepwear. We are told the new PBDE's are safe; only to recently find them in women's bodies and breast milk in dangerous amounts. Our science doesn't even know how these chemicals enter the body. In 2004 we find still another flame retardant, Deca, should be banned. What is next?

There are many impaired, sensitive, and allergic people in the US. These people will likely have reactions and be unable to get away from these chemicals once they are in all mattresses. Does this alone harm more people than we save?

Three thousand people die in fires each year. ISPA estimates up to 300 people will be saved annually under the new law, after all existing mattresses are replaced, after ten or more years. These estimates are debatable. For now, the chemical industry estimates that up to 960 people are saved with the 1.2 billon pounds of flame retardant chemicals the US uses annually. Have we already harmed more people than we have saved? Now we want to rush in and save more people by putting known toxic and untested chemicals in our mattresses of all places. This is close and chronic exposure unparalleled in any other use. What will be the affect on a child who spends their whole life sleeping in poison? It seems likely we will find out too late! What if, history repeats itself, and we later find we have harmed millions of people?

Hippocrates left us with the admonition: "First do no harm."

Is the benefit worth the risk of exposing our entire population?

As one retailer wrote: **"Why doesn't the media expose the truths for our safety!!"**

Sincerely,

Mark Strobel
President

Strobel Technologies
3131 Industrial Parkway
Jeffersonville, IN 47130

health@strobel.com, www.Strobel.com, Phone: 812-280-6000, 800-457-6442, Fax: 812-282-6528,

Please feel free to contact me with questions. Please learn more, find links to your legislators, see retailer comments, and vote on this issue at www.strobel.com/vote.htm

Here is a link to ISPA's response to my letter to retailers, to which I responded above:
http://www.sleepproducts.org/Content/ContentGroups/Advocacy/Flammability2/CPSCLegtalkingpoints.pdf

Notice: The statements and questions contained in this notice are not intended to convey allegations regarding any particular company, person, or association. Readers should conduct their own investigation of a company or association or person to ascertain the particular policies, practices, and motivations of that entity. I have reported what I believe to be true and correct to the best of my knowledge and opinion at the time of its writing in a free speech effort to avert a public health disaster.

Mark Strobel

From: info@peopleforcleanbeds.org
Sent: Wednesday, February 16, 2005 4:04 AM
To: mark@peopleforcleanbeds.org
Subject: Data posted to form 1 of http://www.peopleforcleanbeds.org/vote.htm

****

Oppose_Law: Yes
Member: Yes
Title: Peter
Name: Lehrbass
Degrees:
Company_Org:
Address: 3572 Everest ave
City: Riverside
State: CA
Zip: 92503
Phone: (951)687-7032
Email: ruggrike04@yahoo.com
Send: Submit

Comments1:

Please continue with that compain. We have 2 little children and are very interested in protecting them. Do you know about the www.criblife2000.com? They say that chemicals and molds can cause SIDS. Thanks

Mark Strobel

From: People for Clean Beds.org [mark@PeopleForCleanBeds.org]
Sent: Wednesday, March 02, 2005 6:06 PM
To: mdanello@cpsc.gov; hstratton@cpsc.gov; chairmanstratton@cpsc.gov; tmoore@cpsc.gov; kgiles@cpsc.gov; jhartman@cpsc.gov; mneily@cpsc.gov; cpsc-os@cpsc.gov
Subject: FW: Mattress NPR

-----Original Message-----
From: blueberry531@juno.com [mailto:blueberry531@juno.com]
Sent: Wednesday, March 02, 2005 3:57 PM
To: cpsc-os@cpsc.gov
Subject: Mattress NPR

I strongly oppose the proposed law to flameproof mattresses. The chemicals used are toxic and have health effects. I get muscle and joint aches, fatigue, and headaches when I sleep on a mattess with chemicals. Millions of people would be exposed on an ongoing basis to these untested chimicals.

Jeanne Mellon

Mark Strobel

From: People for Clean Beds.org [mark@PeopleForCleanBeds.org]
Sent: Wednesday, March 02, 2005 3:21 PM
To: mdanello@cpsc.gov; hstratton@cpsc.gov; chairmanstratton@cpsc.gov; tmoore@cpsc.gov; kgiles@cpsc.gov; jhartman@cpsc.gov; mneily@cpsc.gov; cpsc-os@cpsc.gov
Subject: Mattress NPR, FW: Data posted to form 1 of http://www.peopleforcleanbeds.org/vote.htm

-----Original Message-----
From: info@peopleforcleanbeds.org [mailto:info@peopleforcleanbeds.org]
Sent: Wednesday, February 09, 2005 3:28 PM
To: mark@peopleforcleanbeds.org
Subject: Data posted to form 1 of
http://www.peopleforcleanbeds.org/vote.htm

****
****

Oppose_Law: Yes
Member: Yes
Title: Dr.
Name: Anja Sturm
Degrees: PhD
Company_Org:
Address:
City: Newark
State: DE
Zip: 19711
Phone:
Email:
Send: Submit

Comments1:

I have followed some of the mounting evidence that flame retardants are highly toxic and possibly a significant pollutant in our homes with far reaching effects on our health.
I know that other countries are moving away from their use and are considering bans. I am simply baffled that at such a time the US legislature moves to pass a law that would make their use mandatory in all mattresses, thereby even robbing people of their free choice.
I sincerely hope that this campaign to stop such irresponsible legislature will be successful! Thanks.

-----Original Message-----
From: People for Clean Beds.org [mailto:mark@PeopleForCleanBeds.org]
Sent: Wednesday, March 02, 2005 3:31 PM
To: mdanello@cpsc.gov; hstratton@cpsc.gov; chairmanstratton@cpsc.gov; tmoore@cpsc.gov; kgiles@cpsc.gov; jhartman@cpsc.gov; mneily@cpsc.gov; cpsc-os@cpsc.gov
Subject: Mattress NPR FW: Data posted to form 1 of http://www.peopleforcleanbeds.org/vote.htm

-----Original Message-----
From: info@peopleforcleanbeds.org [mailto:info@peopleforcleanbeds.org]
Sent: Tuesday, February 15, 2005 11:35 AM
To: mark@peopleforcleanbeds.org
Subject: Data posted to form 1 of http://www.peopleforcleanbeds.org/vote.htm

****

Oppose_Law: Yes
Member:
Title:
Name: Pat Lee
Degrees: M.A.
Company_Org:
Address:
City: Rockford
State: IL
Zip: 61114
Phone:
Email:
Send: Submit

Comments1:

It is absolutely ludicrous to put fire retardant into mattresses and expect us to breathe these toxic chemicals while we sleep. For what? So a few idiots who are stupid enough to smoke in bed won't burn in case they fall asleep with a lit cigarette in their hand?
I've had multiple chemical sensitivities for more than 15 years and say to the government -- stay out of my bedroom! It's hard enough to live a healthy low chemical lifestyle -- I don't need the government to pass another ridiculous law that will make it even harder.

Mark Strobel

From: info@peopleforcleanbeds.org
Sent: Tuesday, February 08, 2005 2:57 PM
To: mark@peopleforcleanbeds.org
Subject: Data posted to form 1 of http://www.peopleforcleanbeds.org/vote.htm

****

Oppose_Law: Yes
Member: Yes
Title: Ms.
Name: Ruth Fulton
Degrees:
Company_Org:
Address: 2 E Manor Ave
City: Enola
State: PA
Zip: 17025
Phone:
Email: magicgershep@aol.com
Send: Submit

Comments1:

Mark Strobel

From: info@peopleforcleanbeds.org
Sent: Thursday, February 10, 2005 8:54 PM
To: mark@peopleforcleanbeds.org
Subject: Data posted to form 1 of http://www.peopleforcleanbeds.org/vote.htm

****

Oppose_Law: Yes
Member:
Title:
Name: David Atkinson
Degrees:
Company_Org:
Address:
City: Elk City
State: OK
Zip: 73644
Phone:
Email:
Send: Submit

Comments1: